

# EXHIBIT A

EASTERN PROFIT CORPORATION LIMITED vs STRATEGIC VISION US, LLC  
J. Michael Waller on 02/08/2019

1 UNITED STATES DISTRICT COURT  
2 SOUTHERN DISTRICT OF NEW YORK  
3 -----X  
4 EASTERN PROFIT CORPORATION LIMITED,  
5 Plaintiff-Counterclaim Defendant,  
6 Case No.  
7 -against- 18-cv-2185  
8 STRATEGIC VISION US, LLC,  
9 Defendant-Counterclaim Plaintiff,  
10 vs.  
11 GUO WENGUI a/k/a, MILES KWOK,  
12 Counterclaim Defendant.

13 -----X

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16 VIDEOTAPED DEPOSITION

17 OF

18 J. MICHAEL WALLER

19 New York, New York

20 Friday, February 8, 2019

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**EASTERN PROFIT CORPORATION LIMITED vs STRATEGIC VISION US, LLC**  
**J. Michael Waller on 02/08/2019**

Page 2	Page 4
1	1 I N D E X
2	2 WITNESS: J. MICHAEL WALLER PAGE
3	3 BY: MR. GRENDI 8
4	4 BY: MS. TESKE 281
5	5 BY: MR. GRENDI 282
6	6
7 Friday, February 8, 2019	7 LIST OF EXHIBITS
8 10:00 a.m.	8 WALLER DESCRIPTION PAGE
9	9 Exhibit 1 Research Agreement 18
10	10 January 1, 2018
11 Videotaped Deposition of J. MICHAEL WALLER,	11 Exhibit 2 Research Agreement December 46
12 held at the offices of Zeichner, Ellman & Krause	12 29, 2017
13 LLP, 1211 Avenue of the Americas, New York, New	13 Exhibit 3 Handwritten document Bates 105
14 York before Roberta Caiola, a Shorthand Reporter	14 stamped Eastern 11
15 and Notary Public within and for the State of New	15 Exhibit 4 Document Bates stamped 113
16 York.	16 Exhibit 5 Signal text message thread 116
17	17 Exhibit 6 Document entitled "Anita Yui 164
18	18 Suen"
19	19 Exhibit 7 Background Report on Qing 212
20	20 Yao
21	21 Exhibit 8 Letter dated February 23, 214
22	22 2018
23	23 Exhibit 9 Document Bates stamped 226
24	24 SVUS000077
25	25
Page 3	Page 5
1 A P P E A R A N C E S:	1 LIST OF EXHIBITS
2	2 WALLER DESCRIPTION PAGE
3 ZEICHNER, ELLMAN & KRAUSE LLP	3 Exhibit 10 Document Bates stamped 229
4 Attorneys for Eastern Profit Corporation Limited	4 SVUS80
5 1211 Avenue of the Americas	5 Exhibit 11 Document entitled "Time to 233
6 New York, NY 10036	6 Get Them Beginning the
7 BY: ZACHARY GRENDI, ESQ.	7 Psycho-Political Campaign
8 zgrendi@zeklaw.com	8 For China," Bates stamped SV
9	9 385 to SV 402
10 HODGSON RUSS LLP	10 Exhibit 12 Document Bates stamped 255
11 Attorneys for Guo Wengui a/k/a, Miles Kwok	11 SVUS260
12 605 Third Avenue, Suite 2300	12 Exhibit 13 Document Bates stamped 259
13 New York, New York 10158	13 SVUS00262
14 BY: ERIN N. TESKE, ESQ.	14 Exhibit 14 Document entitled "All 261
15	15 Source Intelligence
16 PHILLIPS LYTLE LLP	16 Collection Posture"
17 Attorneys for Strategic Vision US, LLC	17 Exhibit 15 Subject Chart, Bates stamped 263
18 340 Madison Avenue	18 SVUS278
19 New York, New York 10173-1922	19 Exhibit 16 Document Bates stamped 267
20 BY: JOSEPH B. SCHMIDT, ESQ.	20 SVUS267 and 268
21 jschmidt@phillipslytle.com	21 Exhibit 17 Document Bates stamped 270
22	22 Eastern 250
23 ALSO PRESENT:	23 Exhibit 18 Supplemental Interrogatories 282
24 JAYSUN LOUSHIN, The Videographer	24 submitted by Strategic
25	25 Vision

**EASTERN PROFIT CORPORATION LIMITED vs STRATEGIC VISION US, LLC**  
**J. Michael Waller on 02/08/2019**

<p style="text-align: right;">Page 6</p> <p>1 LIST OF EXHIBITS</p> <p>2 WALLER DESCRIPTION PAGE</p> <p>3 Exhibit 19 Amended Answer and 283</p> <p>4 Counterclaims</p> <p>5 (Exhibits retained by Counsel.)</p> <p>6</p> <p>7 (*r) DOCUMENTS:</p> <p>8 Page: 20</p> <p>9 Page: 22</p> <p>10 Page: 40</p> <p>11 Page: 154</p> <p>12 Page: 169</p> <p>13</p> <p>14</p> <p>15</p> <p>16</p> <p>17</p> <p>18</p> <p>19</p> <p>20</p> <p>21</p> <p>22</p> <p>23</p> <p>24</p> <p>25</p>	<p style="text-align: right;">Page 8</p> <p>1 EXAMINATION BY</p> <p>2 MR. GRENDI:</p> <p>3 Q. Good morning, Mr. Waller. My name is</p> <p>4 Zach Grendi. I represent the plaintiff in this</p> <p>5 matter, Eastern Profit.</p> <p>6 Have you ever taken a deposition</p> <p>7 before, or given a deposition?</p> <p>8 A. Yes.</p> <p>9 Q. So I'm just going to go over a couple</p> <p>10 of ground rules before we get started. Please</p> <p>11 wait until I finish asking a question to respond</p> <p>12 to the question. That way, the court reporter</p> <p>13 can take down your testimony and my questions</p> <p>14 accurately. If we're talking over one another,</p> <p>15 it's very hard for the court reporter.</p> <p>16 If you need a break at any time, please</p> <p>17 let us know and we can take one. We're going to</p> <p>18 try to get through as much of this as we can</p> <p>19 today, and that's about it.</p> <p>20 So please tell me your full legal name.</p> <p>21 I know you go as J. Michael Waller.</p> <p>22 A. John Michael Waller.</p> <p>23 Q. That would be the name on your birth</p> <p>24 certificate?</p> <p>25 A. Yes.</p>
<p style="text-align: right;">Page 7</p> <p>1 THE VIDEOGRAPHER: Good morning. We</p> <p>2 are now going on the record with the</p> <p>3 deposition of Michael Waller in the matter</p> <p>4 of Eastern Profit Corporation Limited versus</p> <p>5 Strategic Vision US, LLC. Today's date is</p> <p>6 February 8th. The time is 9:59.</p> <p>7 I am the videographer, and the court</p> <p>8 reporter is Roberta Caiola. My name is</p> <p>9 Jaysun Loushin from Huseby Global</p> <p>10 Litigation.</p> <p>11 Will counsel please introduce</p> <p>12 themselves followed by the swearing in of</p> <p>13 the witness.</p> <p>14 MR. GRENDI: Sure. I'm Zach Grendi of</p> <p>15 Zeichner, Ellman &amp; Krause for the plaintiff,</p> <p>16 Eastern Profit.</p> <p>17 MR. SCHMIDT: Hi. I'm Joe Schmidt for</p> <p>18 Strategic Vision and the witness.</p> <p>19 MS. TESKE: I'm Erin Teske with Hodgson</p> <p>20 Russ, on behalf of Mr. Kwok.</p> <p>21</p> <p>22 J. MICHAEL WALLER, called as a witness, having</p> <p>23 been first duly sworn by a Notary Public of the</p> <p>24 State of New York, testifies as follows:</p> <p>25</p>	<p style="text-align: right;">Page 9</p> <p>1 Q. What is your address?</p> <p>2 A. 623 Lexington Place South – Northeast,</p> <p>3 Washington, D.C., 20002.</p> <p>4 Q. And just briefly, can you describe your</p> <p>5 educational background?</p> <p>6 A. I have a bachelor's degree Phi Beta</p> <p>7 Kappa from George Washington University, a</p> <p>8 master's degree from Boston University, and a</p> <p>9 Ph.D. from Boston University.</p> <p>10 Q. And after you graduated from school,</p> <p>11 what is your work history, briefly?</p> <p>12 A. Work history is working with non-profit</p> <p>13 research and policy groups principally in</p> <p>14 Washington, D.C. and as the Annenberg Professor</p> <p>15 of International Communication at the Institute</p> <p>16 of World Politics, a grad school, and then in</p> <p>17 private business.</p> <p>18 Q. Okay. What are some of the private</p> <p>19 business work experience that you've had?</p> <p>20 A. Business development and opposition</p> <p>21 research.</p> <p>22 Q. Can you name any entities that you</p> <p>23 provided that service to? And by that, I mean –</p> <p>24 I just want to be clear, not the client, the name</p> <p>25 of the companies that you were working for doing</p>

EASTERN PROFIT CORPORATION LIMITED vs STRATEGIC VISION US, LLC  
J. Michael Waller on 02/08/2019

<p style="text-align: right;">Page 10</p> <p>1 that work.</p> <p>2 MR. SCHMIDT: Your employer.</p> <p>3 MR. GRENDI: Employer, yeah.</p> <p>4 A. I do mean principally, principally as</p> <p>5 my own contractor for myself through my company,</p> <p>6 through Oceanic Advisors or Liberty Tree</p> <p>7 Partners.</p> <p>8 Q. How do you know French Wallop?</p> <p>9 A. I met her about, first about 35 years</p> <p>10 ago. I had been a Senate staffer and her husband</p> <p>11 was a U.S. senator.</p> <p>12 Q. Were you a staffer for Ms. Wallop's</p> <p>13 husband?</p> <p>14 A. No.</p> <p>15 Q. Did you meet him through your work as a</p> <p>16 staffer?</p> <p>17 A. The senator?</p> <p>18 Q. Yes.</p> <p>19 A. Yes.</p> <p>20 Q. Is that how you met French Wallop?</p> <p>21 A. I don't recall. It could have been at</p> <p>22 a reception or some other event.</p> <p>23 Q. When did you start working with</p> <p>24 French Wallop in connection with</p> <p>25 Strategic Vision?</p>	<p style="text-align: right;">Page 12</p> <p>1 Q. And so when did you do your first</p> <p>2 project with Strategic Vision and French Wallop?</p> <p>3 You said you started talking in early</p> <p>4 2017. When did you do your first project with</p> <p>5 Strategic Vision?</p> <p>6 A. We had several going on at once at</p> <p>7 about the same time, so I can't – either late</p> <p>8 2016 or early 2017.</p> <p>9 Q. So you jumped right in after discussing</p> <p>10 with Ms. Wallop working together. She said, "Can</p> <p>11 you help on a couple of projects?"</p> <p>12 Is that what happened?</p> <p>13 A. Yeah. It's more of you get together</p> <p>14 and you talk about ideas, and you brainstorm</p> <p>15 about what kind of clients are out there or what</p> <p>16 kind of work should be done or needs to be done,</p> <p>17 and then where we would properly fit in and what</p> <p>18 type of teams to build.</p> <p>19 Q. And so how many projects have you done</p> <p>20 with Strategic Vision?</p> <p>21 A. None of it's written down, meaning we</p> <p>22 don't have a contract, so we just work together</p> <p>23 because we trust each other. We have probably</p> <p>24 two right now.</p> <p>25 Q. Just historically, how many different</p>
<p style="text-align: right;">Page 11</p> <p>1 A. 2016, maybe 2017.</p> <p>2 Q. How did that come about?</p> <p>3 A. We had talked a lot about doing</p> <p>4 different business projects. We had worked</p> <p>5 together during the Iraq War and the Afghanistan</p> <p>6 War but never actually did contractual work. It</p> <p>7 was just mutual collaboration on work relating to</p> <p>8 opposing jihadist movements, and then we</p> <p>9 discussed ways to do business with a variety of</p> <p>10 prospective clients in 2017.</p> <p>11 Q. You're saying 2017 now?</p> <p>12 A. 2016-2017. I feel more comfortable</p> <p>13 saying early 2017.</p> <p>14 Q. Okay. What was the nature of the work</p> <p>15 you were doing with French Wallop before you</p> <p>16 started talking about working with Strategic</p> <p>17 Vision, the Iraq War and Afghanistan War?</p> <p>18 A. That was information opposition support</p> <p>19 for the U.S. Special Operations Forces, or I'll</p> <p>20 say U.S. Military in general.</p> <p>21 Q. So you were both providing that kind of</p> <p>22 service to the U.S. Military?</p> <p>23 A. Yes, independently. And we had – when</p> <p>24 she was working on another project, we had talked</p> <p>25 about bringing me in, but we didn't.</p>	<p style="text-align: right;">Page 13</p> <p>1 projects or clients have you serviced with</p> <p>2 Strategic Vision?</p> <p>3 A. Probably two previous. The ones we're</p> <p>4 working on now are not yet clients. We're just</p> <p>5 working on building them as clients.</p> <p>6 Q. So you're not performing any service</p> <p>7 for just Strategic Vision right now for any of</p> <p>8 its clients?</p> <p>9 A. No.</p> <p>10 Q. And you're working on maybe doing two?</p> <p>11 A. Yes.</p> <p>12 Q. Other than the project that we're going</p> <p>13 to discuss in this case with Eastern Profit, how</p> <p>14 many other projects have you done for Strategic</p> <p>15 Vision?</p> <p>16 A. Probably two.</p> <p>17 Q. That you actually performed work on?</p> <p>18 A. Yeah.</p> <p>19 Q. When was that?</p> <p>20 A. Let me correct my earlier statement. I</p> <p>21 think it was 2016 when I first did work with her.</p> <p>22 Q. That's fine. So there were two other</p> <p>23 projects that you performed for Strategic</p> <p>24 Vision –</p> <p>25 A. Yes.</p>

EASTERN PROFIT CORPORATION LIMITED vs STRATEGIC VISION US, LLC  
J. Michael Waller on 02/08/2019

<p style="text-align: right;">Page 14</p> <p>1 Q. – other than this one?</p> <p>2 A. Yes.</p> <p>3 Q. So three total that you've performed</p> <p>4 work for Strategic Vision?</p> <p>5 A. This is the third one, yes.</p> <p>6 Q. And without identifying the name of any</p> <p>7 of the clients or anything like that, what was</p> <p>8 the substance of that kind of work, the other two</p> <p>9 projects that you performed?</p> <p>10 A. Opposition research and political/</p> <p>11 policy work, messaging.</p> <p>12 Q. What is the opposition research? Can</p> <p>13 you break that down a little bit and explain what</p> <p>14 that means?</p> <p>15 A. Yeah, it's common in political</p> <p>16 campaign-type work, but you can use it for really</p> <p>17 anything where you want to research who your</p> <p>18 opposition is, everything you can find out about</p> <p>19 the opposition and use that for advancing your</p> <p>20 political or policy purposes.</p> <p>21 Q. So was it investigation work?</p> <p>22 A. Yes.</p> <p>23 Q. What kind of investigation work? Can</p> <p>24 you describe it?</p> <p>25 A. Computer research, sort of academic</p>	<p style="text-align: right;">Page 16</p> <p>1 Q. So it doesn't have a storefront or</p> <p>2 office or anything like that?</p> <p>3 A. No.</p> <p>4 Q. Do you work in that office when you're</p> <p>5 working on a project for Strategic Vision?</p> <p>6 A. No. We'll meet at her house to talk,</p> <p>7 that's all.</p> <p>8 Q. Just going back to your career. How</p> <p>9 many opposition research projects have you</p> <p>10 performed in your career?</p> <p>11 A. More than a hundred.</p> <p>12 Q. Some of those are within the</p> <p>13 United States?</p> <p>14 A. Both in the United States and abroad.</p> <p>15 Q. What's the split there, if you can</p> <p>16 ballpark that?</p> <p>17 A. Roughly 50/50 either way. I couldn't</p> <p>18 quantify it.</p> <p>19 Q. So sometimes the subjects of an</p> <p>20 investigation are in other countries and</p> <p>21 sometimes they're in the United States?</p> <p>22 A. Yes.</p> <p>23 Q. Does French Wallop ever do this kind of</p> <p>24 investigatory work, opposition research?</p> <p>25 A. She does, using different methods.</p>
<p style="text-align: right;">Page 15</p> <p>1 research, good old-fashioned detective-type work.</p> <p>2 The same way you would do a background</p> <p>3 investigation.</p> <p>4 Q. And do you do that work personally?</p> <p>5 A. I do some of it personally, but I</p> <p>6 arrange teams where it's beyond my expertise or</p> <p>7 where the scope is too large.</p> <p>8 Q. So sometimes you'll perform the</p> <p>9 investigatory research yourself if the resources</p> <p>10 are available?</p> <p>11 A. Yes, or if my capabilities are there.</p> <p>12 If they're beyond my capabilities, I'll hire out</p> <p>13 the talent.</p> <p>14 Q. So you've done that for Strategic</p> <p>15 Vision?</p> <p>16 A. Yes.</p> <p>17 Q. What if the research is beyond your</p> <p>18 capabilities?</p> <p>19 A. You hire people who have those</p> <p>20 capabilities.</p> <p>21 Q. You have contacts who can do that kind</p> <p>22 of research when you can't do it?</p> <p>23 A. Yes.</p> <p>24 Q. Where is Strategic Vision located?</p> <p>25 A. At French Wallop's house.</p>	<p style="text-align: right;">Page 17</p> <p>1 Q. So if you and French Wallop are working</p> <p>2 on a project? What's the division of labor?</p> <p>3 What work would you do and what work would she</p> <p>4 do?</p> <p>5 A. She normally does the networking in the</p> <p>6 political or diplomatic or intelligence</p> <p>7 communities through her personal networks. Her</p> <p>8 husband was on the Senate Intelligence Committee,</p> <p>9 so she has connections going back longer than</p> <p>10 I've known her. She's maintained all those</p> <p>11 contacts worldwide, and she's multilingual and</p> <p>12 she's traveled very extensively. So she'll use</p> <p>13 those higher level contacts, and then I'll do the</p> <p>14 more nuts-and-bolts work.</p> <p>15 Q. So in other words, Ms. Wallop might use</p> <p>16 her network of contacts to get a certain amount</p> <p>17 of information, investigatory research, and then</p> <p>18 you might drill down on that data.</p> <p>19 Is that fair to say?</p> <p>20 A. Yeah. On occasion, yeah.</p> <p>21 Q. Let's look at a document here, and</p> <p>22 we'll mark it as Waller 1.</p> <p>23 MR. SCHMIDT: Unless you just want to</p> <p>24 continue numbering them.</p> <p>25 MR. GRENDI: I think I'm just going to</p>

EASTERN PROFIT CORPORATION LIMITED vs STRATEGIC VISION US, LLC  
J. Michael Waller on 02/08/2019

<p style="text-align: right;">Page 18</p> <p>1 do them by name. There's going to be some 2 overlap, so I don't want to mix and match. 3 I just want to keep them separate. I have 4 to be careful not to give you the one that 5 I've marked up, so please bear with me. 6 (Waller Exhibit 1, Research Agreement 7 January 1, 2018, marked for identification.) 8 MS. TESKE: Sorry, you said this is 9 Waller 1? 10 MR. GRENDI: Yeah, this is Waller 1. 11 Q. Mr. Waller, can you please just take a 12 moment to look at this document and let me know 13 when you're done reviewing it. You don't have to 14 read every word. Just familiarize yourself with 15 it. 16 A. Okay. 17 Q. Mr. Waller, do you recognize this 18 document? 19 A. I recognize one with a different date 20 that's filled out. 21 Q. Before today, you don't know if you've 22 ever seen this document? 23 A. I'm not sure. There are several 24 versions of it. 25 Q. Let me ask you about that. So does</p>	<p style="text-align: right;">Page 20</p> <p>1 (*) MR. GRENDI: Joe, I think we are going 2 to call for the production of any drafts 3 that weren't already produced. 4 MR. SCHMIDT: All right. 5 Q. So do you have those prior drafts in 6 your computer at home? 7 A. I have one, I think, dated December 29, 8 2017. 9 Q. Were there any drafts before 10 December 29, 2017? 11 A. I don't know. It was with Guo and 12 Lianchao Han and French Wallop, and then later on 13 with only French Wallop and Yvette Wang. 14 Q. You said before that you worked on the 15 first draft of a document like this, is that 16 right? 17 A. On initial drafts, but yes. 18 Q. When did you do that initial draft? 19 MR. SCHMIDT: Objection. 20 MR. GRENDI: Is the witness going to 21 answer or are you saying he's not going to 22 answer? 23 MR. SCHMIDT: It's a form objection. 24 You can answer. 25 THE WITNESS: When there's an</p>
<p style="text-align: right;">Page 19</p> <p>1 Strategic Vision have a standard research 2 agreement that it uses for its clients? 3 A. I don't know. 4 Q. Have you seen an agreement similar to 5 this in the past? 6 A. No. Well, apart from earlier drafts of 7 this one, no. 8 Q. So you don't know, sitting here today, 9 whether Strategic Vision has a stock agreement 10 that it provides to its clients when there's a 11 project of this nature? 12 A. I don't know. 13 Q. So you don't know how long Strategic 14 Vision has used this document? 15 A. I wrote the draft of this with Guo. 16 Q. You wrote this document? 17 MR. SCHMIDT: Just give me a chance to 18 object. 19 THE WITNESS: Okay. 20 MR. SCHMIDT: No, go ahead. You're 21 good. 22 Q. Did you write the original draft of 23 this research agreement? 24 A. Not this draft, but I wrote drafts 25 leading up to what appears to be this draft.</p>	<p style="text-align: right;">Page 21</p> <p>1 objection, am I bound to answer? 2 MR. SCHMIDT: If I don't instruct you 3 not to answer, you can go ahead and answer. 4 THE WITNESS: Repeat the question, 5 please. 6 MR. GRENDI: Can you read it back, 7 please. 8 (Whereupon, the referred to question 9 was read back by the Reporter.) 10 A. It's hard to say exactly because we 11 were developing the concept, developing the work 12 plan, developing the budgets, and so it would 13 have been depending on what an initial draft is, 14 in November or December of 2017, probably 15 December 2017. 16 Q. Who did you work with on that draft, 17 the first draft? 18 A. With Miles Kwok directly, with Lianchao 19 Han as the interpreter and facilitator, and with 20 French Wallop. 21 Q. Where was that? That sounds like it 22 was a meeting in person. 23 A. Yes. It was at Miles Kwok's residence 24 in New York City. 25 Q. That was around, you're saying, early</p>

EASTERN PROFIT CORPORATION LIMITED vs STRATEGIC VISION US, LLC  
J. Michael Waller on 02/08/2019

<p style="text-align: right;">Page 22</p> <p>1 December 2017?</p> <p>2 A. Roughly, yeah. I'd have to go back and</p> <p>3 check. I can give you an absolute date. We went</p> <p>4 through ideas first, which wouldn't be a draft of</p> <p>5 the contract, and then we did the draft of the</p> <p>6 contract. We did it directly at Kwok's</p> <p>7 residence.</p> <p>8 Q. So did you handwrite it or did someone</p> <p>9 else handwrite it or was there a computer</p> <p>10 involved? Can you just describe the writing</p> <p>11 process?</p> <p>12 A. Yeah, I would have handwritten it</p> <p>13 because we did not have computers in those</p> <p>14 meetings.</p> <p>15 Q. So you took handwritten notes as to</p> <p>16 what the provisions of the contract would be?</p> <p>17 A. Yes.</p> <p>18 Q. Did anyone else take notes like that?</p> <p>19 A. I don't recall.</p> <p>20 (*r) MR. GRENDI: We would also call for the</p> <p>21 production of those notes, Joe.</p> <p>22 Q. So please, if you would, describe what</p> <p>23 was discussed at this meeting where the first</p> <p>24 draft of the research agreement was memorialized</p> <p>25 or discussed.</p>	<p style="text-align: right;">Page 24</p> <p>1 A. He uses three names. Miles Kwok, I</p> <p>2 suppose, is the name he's using today for his</p> <p>3 representation here.</p> <p>4 Q. Do you also know him as Guo Wengui?</p> <p>5 A. Yes.</p> <p>6 Q. You said there were three names.</p> <p>7 A. There was a third name that contained</p> <p>8 the name "Guo." I don't recall the exact part of</p> <p>9 the name.</p> <p>10 Q. This meeting that you say occurred at</p> <p>11 Mr. Guo's, you say, apartment –</p> <p>12 A. Yes, or whatever his unit is called.</p> <p>13 Q. – in December of 2017, was that the</p> <p>14 first time you had met him?</p> <p>15 A. Yes.</p> <p>16 Q. You described he told you what he</p> <p>17 wanted. What did he tell you he wanted?</p> <p>18 A. He wanted to do battle with the Chinese</p> <p>19 Communist Party leadership.</p> <p>20 Q. Can you explain a little bit more about</p> <p>21 what you thought he meant by that?</p> <p>22 A. Yes. He wanted to exploit divisions</p> <p>23 within the Communist Party leadership as</p> <p>24 President Xi was consolidating power. He wanted</p> <p>25 to take advantage. He wanted to exploit</p>
<p style="text-align: right;">Page 23</p> <p>1 A. It was a lengthy meeting at his house.</p> <p>2 It was split up by a sit-down in his living room</p> <p>3 and then conversations in his dining room. And</p> <p>4 it was developed – he told us what he wanted to</p> <p>5 do. We then said how we could meet that. We</p> <p>6 told him some of the things to do may not be</p> <p>7 legal in the United States to do. He was fine</p> <p>8 with that.</p> <p>9 Then we developed the scope, and then</p> <p>10 from the scope developed a budget. And I can't</p> <p>11 recall specifically if we discussed the budget in</p> <p>12 that first meeting or subsequently, and I did not</p> <p>13 save a lot of the notes on purpose.</p> <p>14 Q. So you threw away the notes?</p> <p>15 A. Yeah.</p> <p>16 Q. When did you dispose of the notes?</p> <p>17 A. Ordinarily I destroyed my notes on</p> <p>18 things where they have to be confidential, where</p> <p>19 there's a high-risk environment, to protect the</p> <p>20 client and to protect our own people, so I don't</p> <p>21 remember when I would have done that. It would</p> <p>22 have been certainly before any dispute arose.</p> <p>23 Q. You mentioned what – you said Mr. Guo</p> <p>24 want. Who are you talking about when you say</p> <p>25 "Mr. Guo"?</p>	<p style="text-align: right;">Page 25</p> <p>1 differences within the regime and within other</p> <p>2 Chinese billionaires living both inside and</p> <p>3 outside the People's Republic of China for the</p> <p>4 purposes of disrupting the Xi government. He</p> <p>5 also wanted to expose the family networks of</p> <p>6 certain of those Communist Party officials,</p> <p>7 including what he described was their children</p> <p>8 born out of wedlock who lived under different</p> <p>9 names with relatives who managed the party</p> <p>10 leaders' illegally gained funds and a range of</p> <p>11 things related to that. The bottom line was it</p> <p>12 was for disruption of the Chinese Communist Party</p> <p>13 leadership.</p> <p>14 Q. Was this the first time you had heard</p> <p>15 about that being the supposed goal of this</p> <p>16 research or request?</p> <p>17 A. Before I met him, I was told that he</p> <p>18 was going to do this, and that's why I took an</p> <p>19 interest in doing it.</p> <p>20 Q. Who told you about that interest?</p> <p>21 A. French Wallop told me and Lianchao Han</p> <p>22 told me and Bill Gertz told me.</p> <p>23 Q. Let's just go one at a time. Who is</p> <p>24 the first one of those three people to tell you</p> <p>25 or was it maybe one meeting?</p>



EASTERN PROFIT CORPORATION LIMITED vs STRATEGIC VISION US, LLC  
J. Michael Waller on 02/08/2019

<p style="text-align: right;">Page 26</p> <p>1 A. I believe it was French Wallop.</p> <p>2 Q. And then subsequent to that, you talked</p> <p>3 to who about that?</p> <p>4 A. To Lianchao Han, L-i-a-n-c-h-a-o. The</p> <p>5 second name is H-a-n.</p> <p>6 Q. This is all before this December</p> <p>7 meeting in Mr. Guo's apartment?</p> <p>8 A. Yes.</p> <p>9 Q. When did you talk to Bill Gertz?</p> <p>10 A. At about that same time. Bill Gertz</p> <p>11 had asked French Wallop if she could do this</p> <p>12 work. She said she would like to bring me in.</p> <p>13 He thought it would be a great idea, in his</p> <p>14 words, and Lianchao Han agreed. And that's when</p> <p>15 I was brought up to meet – then I conferred with</p> <p>16 Lianchao and was brought up to meet Guo.</p> <p>17 Q. So Mr. Guo apparently described what he</p> <p>18 wanted to do, and then you said that Strategic</p> <p>19 Vision – let's strike that and start over.</p> <p>20 Sorry.</p> <p>21 So Mr. Guo told you what he wanted from</p> <p>22 you and Ms. Wallop. What did you tell him back</p> <p>23 in terms of what Strategic Vision and you</p> <p>24 yourself could provide as a service?</p> <p>25 A. First, I never spoke on behalf of</p>	<p style="text-align: right;">Page 28</p> <p>1 the client confidentiality and the</p> <p>2 confidentiality of the work.</p> <p>3 Q. So you're saying at the outset here you</p> <p>4 explained to Mr. Guo and Mr. Lianchao that</p> <p>5 Strategic Vision and you personally are not</p> <p>6 working together directly. That you're, I guess,</p> <p>7 an independent contractor?</p> <p>8 A. Yes, that would be accurate, as an</p> <p>9 independent contractor.</p> <p>10 Q. And you explained that to Mr. Guo and</p> <p>11 Mr. Lianchao?</p> <p>12 A. Yes.</p> <p>13 Q. Did they say anything when you</p> <p>14 explained that?</p> <p>15 A. No.</p> <p>16 Q. Getting back to my original question,</p> <p>17 what did you and Strategic Vision, through</p> <p>18 Ms. Wallop, explain as a possible service that</p> <p>19 could be provided to Eastern Profit?</p> <p>20 A. We could provide this opposition</p> <p>21 research to Guo. That we would set up the teams</p> <p>22 to do the work. That the work would have to be</p> <p>23 done both in the United States and outside the</p> <p>24 United States. That we were starting up cold.</p> <p>25 We never implied that we had a corporate entity</p>
<p style="text-align: right;">Page 27</p> <p>1 Strategic Vision.</p> <p>2 Q. Okay. Who were you speaking on behalf</p> <p>3 of?</p> <p>4 A. On behalf of myself.</p> <p>5 Q. So you don't have an employment</p> <p>6 agreement with Strategic Vision?</p> <p>7 A. No.</p> <p>8 Q. Did you explain to Mr. Guo and</p> <p>9 Mr. Lianchao that you did not work for Strategic</p> <p>10 Vision?</p> <p>11 A. Yes.</p> <p>12 Q. When was it? Was that at this meeting</p> <p>13 that you're talking about now?</p> <p>14 A. It was probably at the first meeting</p> <p>15 with Guo. I never implied anything that I worked</p> <p>16 for Strategic Vision.</p> <p>17 Q. Did you explicitly say "I don't work</p> <p>18 for Strategic Vision"?</p> <p>19 A. I don't recall if it was quite put that</p> <p>20 way. I would let Ms. Wallop answer that because</p> <p>21 she was speaking for her company. We presented</p> <p>22 ourselves as a team, and we were specific that we</p> <p>23 assemble teams on an as-needed basis to do this</p> <p>24 type of research because there's no corporate</p> <p>25 profile. And that was essential for maintaining</p>	<p style="text-align: right;">Page 29</p> <p>1 with a staff and resources, that we would be</p> <p>2 starting this up from scratch as we do with all</p> <p>3 our projects. So he was fine with that.</p> <p>4 Q. Did you or Ms. Wallop explain what</p> <p>5 either your capabilities or Ms. Wallop's</p> <p>6 capabilities were in terms of providing this</p> <p>7 research?</p> <p>8 MR. SCHMIDT: Objection. Go ahead.</p> <p>9 Q. Let me break it down, then.</p> <p>10 Did you explain what you could provide</p> <p>11 as a service in connection with this research?</p> <p>12 A. Yes.</p> <p>13 Q. And what did you explain to the parties</p> <p>14 present?</p> <p>15 A. That I would assemble the research team</p> <p>16 and supervise the research team.</p> <p>17 Q. That's the research team that would</p> <p>18 perform investigatory research?</p> <p>19 A. Yes.</p> <p>20 Q. Did Ms. Wallop explain what Strategic</p> <p>21 Vision could provide in connection with this</p> <p>22 research?</p> <p>23 A. Yes.</p> <p>24 Q. What did she say, if you recall?</p> <p>25 A. I don't recall exactly.</p>

**EASTERN PROFIT CORPORATION LIMITED vs STRATEGIC VISION US, LLC**  
**J. Michael Waller on 02/08/2019**

<p style="text-align: right;">Page 30</p> <p>1 Q. What do you recall generally?</p> <p>2 A. That she could get the work done.</p> <p>3 Q. Were any other services described or</p> <p>4 offered at this meeting, other than – let's call</p> <p>5 it investigatory research or, as you called it,</p> <p>6 opposition research?</p> <p>7 A. Yes. Guo had a big vision of things</p> <p>8 that he wanted to do, and between Mrs. Wallop's</p> <p>9 own research and connections and my own, we could</p> <p>10 provide all of that or arrange for it to be</p> <p>11 provided.</p> <p>12 Q. What were these other services?</p> <p>13 A. Guo was invested in purchasing real</p> <p>14 estate in Washington, D.C. and in New York City</p> <p>15 and Westchester County. Mrs. Wallop had been</p> <p>16 involved with high-end real estate in the past,</p> <p>17 so she took that on.</p> <p>18 Q. So that was discussed at this meeting?</p> <p>19 A. I believe it was at that meeting. If I</p> <p>20 remember correctly, Lianchao first raised it with</p> <p>21 us before we met Guo.</p> <p>22 Q. When you say "we," you mean you and</p> <p>23 Ms. Wallop?</p> <p>24 A. Yes.</p> <p>25 Q. Now, at the time of this meeting in</p>	<p style="text-align: right;">Page 32</p> <p>1 He also wanted to set up a media</p> <p>2 organization tentatively called Guo Media, and we</p> <p>3 discussed various aspects of that.</p> <p>4 Q. Did Strategic Vision and Mr. Guo ever</p> <p>5 agree to those other services? Let's call them</p> <p>6 non-investigatory services?</p> <p>7 A. I don't think it was contractual. I</p> <p>8 think it was just verbal. Because I do know that</p> <p>9 she took Yvette around to look at certain</p> <p>10 properties in Washington, D.C.</p> <p>11 Q. But to your knowledge, there was never</p> <p>12 any written agreement between Mr. Guo and</p> <p>13 Strategic Vision concerning these other services?</p> <p>14 A. Not that I know of.</p> <p>15 Q. Going back to the terms of the research</p> <p>16 agreement that you were drafting at this meeting.</p> <p>17 To the extent you can recall, what were the basic</p> <p>18 terms that were discussed that you wrote down or</p> <p>19 remember?</p> <p>20 MR. SCHMIDT: Just objection, but go</p> <p>21 ahead.</p> <p>22 A. Okay. First I'd have to sort out one</p> <p>23 meeting from the other and then what we discussed</p> <p>24 before or after the meeting without Guo present,</p> <p>25 so everything might not be completely accurate.</p>
<p style="text-align: right;">Page 31</p> <p>1 Mr. Guo's apartment, did you understand that</p> <p>2 there had been prior meetings between either</p> <p>3 Mr. Guo or Yvette Wang or Lianchao Han and</p> <p>4 Strategic Vision?</p> <p>5 A. And Strategic Vision, no.</p> <p>6 Q. What about French Wallop?</p> <p>7 A. I don't know. No, no.</p> <p>8 MR. SCHMIDT: No, you don't believe</p> <p>9 they met before?</p> <p>10 THE WITNESS: I don't believe they met</p> <p>11 before.</p> <p>12 Q. So you're not sure if French Wallop had</p> <p>13 shown Mr. Guo or Yvette Wang real estate in the</p> <p>14 Washington, D.C. area prior to this meeting?</p> <p>15 A. No, that was after the meeting. There</p> <p>16 was more that he asked us to do.</p> <p>17 Q. Such as?</p> <p>18 A. He wanted to set up a foundation, a</p> <p>19 non-profit foundation for public policy relating</p> <p>20 to China based in Washington, D.C. He discussed</p> <p>21 certain properties he wanted to buy in</p> <p>22 Washington, D.C. to house that foundation, a</p> <p>23 prestige property in Georgetown and a property</p> <p>24 right across from the U.S. Treasury Department</p> <p>25 overlooking the White House.</p>	<p style="text-align: right;">Page 33</p> <p>1 MR. SCHMIDT: Is the question just what</p> <p>2 he drafted at that December meeting, the</p> <p>3 notes he took? That's the problem with the</p> <p>4 question.</p> <p>5 MR. GRENDI: That's fair.</p> <p>6 MR. SCHMIDT: Maybe we can narrow it,</p> <p>7 take it one bite at a time.</p> <p>8 Q. What were the notes that you took, to</p> <p>9 the extent you recall, regarding this agreement</p> <p>10 at the meeting at Mr. Guo's apartment that we've</p> <p>11 been discussing?</p> <p>12 A. The general things that he wanted were</p> <p>13 he wanted to investigate up to 4,000 individuals</p> <p>14 in China or Chinese nationals living outside</p> <p>15 China, and he wanted to start with ten. He</p> <p>16 described the types of research he wanted done.</p> <p>17 Q. Would that include financial forensic</p> <p>18 research?</p> <p>19 A. Yes.</p> <p>20 Q. And would it include tracking research?</p> <p>21 A. Yes.</p> <p>22 Q. How about social media research?</p> <p>23 A. Yes.</p> <p>24 Q. So if you look at what we marked as</p> <p>25 Waller 1, do items A, B and C describe the type</p>

EASTERN PROFIT CORPORATION LIMITED vs STRATEGIC VISION US, LLC  
J. Michael Waller on 02/08/2019

<p style="text-align: right;">Page 34</p> <p>1 of services that Mr. Guo apparently asked for at 2 this meeting? 3 A. Yes. 4 MR. SCHMIDT: Objection. 5 Q. What else was discussed at the meeting, 6 other than the 4,000 individuals starting with 7 ten, and the types of research? 8 A. Guo had a three-year plan. He wanted a 9 three-year contract to fulfill that plan. He had 10 a larger plan of his own of which this was just 11 supposedly a small part. 12 Q. Anything else you recall? 13 A. He was extremely conscious of his own 14 personal security. He expressed fear that he 15 would be murdered. He expressed concern for his 16 property that was still in China, his overall 17 interest in China. He expressed concern that 18 under no circumstances should our relationship 19 ever be divulged to anyone. 20 We discussed security measures we would 21 take, which were rather extraordinary because 22 they were meant to avoid detection by the Chinese 23 intelligence services called MSS, which is 24 extremely active in the United States. 25 Q. That's MMS, you said?</p>	<p style="text-align: right;">Page 36</p> <p>1 One of the issues was a deposit of \$1 2 million to finance the start-up of getting the 3 teams in order and getting all the pieces in 4 place. 5 Q. Is \$1 million the kind of starting 6 negotiating point that Strategic Vision had, or 7 did they demand a different sum? 8 A. No, we had a larger sum for the work 9 involved, but we needed the funds to start up the 10 teams and to get all the pieces in place. We 11 were very explicit that we were starting up cold. 12 We requested it first as a signing bonus. He 13 disagreed. He objected to that completely, so we 14 agreed on a deposit which would be credited to 15 the last month, roughly month and a third of the 16 contract, so he wouldn't pay us a final payment 17 at the end of year one. We would just deduct 18 that. We would just deduct the deposit as our 19 payment. 20 Q. What about other payment terms? Were 21 they discussed? 22 A. Yes. They were to be, specifically to 23 be circuitous payments so that the Chinese 24 intelligence authorities could not find that he 25 was making payments to any of us.</p>
<p style="text-align: right;">Page 35</p> <p>1 A. MSS, Ministry of State Security. 2 Q. Thanks. Did Strategic Vision or you 3 offer any terms or conditions to providing this 4 service? 5 A. In which way? 6 Q. In other words, you've described what 7 apparently Mr. Guo had requested. Was there 8 anything that Strategic Vision requested in 9 connection with this service? 10 A. From him? 11 Q. Just in connection with providing this 12 investigatory research. For example, price? 13 A. Yeah, of course. 14 MR. SCHMIDT: Do you mean terms that 15 they wanted? 16 MR. GRENDI: Exactly. 17 MR. SCHMIDT: Terms of the contract, 18 did you make any requests at that meeting? 19 A. Sure. We – and I don't know if it was 20 at that specific meeting or one subsequent to it, 21 but at the time of working out the contract, 22 let's say sometime in December of 2017. And some 23 of it was directly with him and some of it was 24 indirectly through Lianchao, and I can't recall 25 necessarily which was which.</p>	<p style="text-align: right;">Page 37</p> <p>1 Q. But other than the deposit, was there 2 any other financial consideration discussed for 3 Strategic Vision's services, or your services? 4 A. Yes. There was a \$750,000-a-month 5 flat-rate payment that was due at the end of the 6 pay period. 7 Q. And that was discussed at this meeting? 8 A. At one of those meetings. I don't 9 recall specifically which. 10 Q. I just want to go back to this meeting 11 in early December at Mr. Guo's apartment. Were 12 there any other terms and conditions that 13 Strategic Vision wanted in connection with this 14 research agreement? 15 A. Financial terms? 16 Q. Any terms. 17 A. Yes, we wanted to be paid obviously on 18 time, within five days of the end of the pay 19 period. We would not issue a formal invoice to 20 avoid having any paperwork or paper trail 21 directly with him. He would arrange for the 22 payments at the end of the month to be made 23 through a circuitous route for the purpose of 24 avoiding detection by the Chinese authorities. 25 If you want to be more specific, I can</p>

EASTERN PROFIT CORPORATION LIMITED vs STRATEGIC VISION US, LLC  
J. Michael Waller on 02/08/2019

<p style="text-align: right;">Page 38</p> <p>1 address things more specifically, but offhand I 2 can't think of anything else. 3 Q. Okay. And in terms of negotiating 4 these terms for Strategic Vision, were you taking 5 a lead on that or was Ms. Wallop taking the lead 6 on that? 7 MR. SCHMIDT: Objection. 8 A. We teamed it. 9 Q. Did you have – 10 A. We worked with Lianchao as Guo's agent 11 or representative prior to this to determine the 12 scope. Then when we met with Guo, he narrowed 13 the scope and then we came to the agreement for 14 750 a month. 15 Q. What was your financial arrangement 16 with Strategic Vision in connection with this 17 research agreement? 18 A. That French Wallop and I would split 19 the profits evenly. 20 Q. Would it be you personally that would 21 split the profits evenly or one of your 22 companies? 23 A. There were LLCs in my name, so it's 24 effectively me paid to one of my LLCs. 25 Q. So your understanding through Strategic</p>	<p style="text-align: right;">Page 40</p> <p>1 the profits, did you have a written agreement or 2 an oral agreement? 3 A. Verbal agreement. 4 Q. So there's no written agreement between 5 you and Ms. Wallop concerning how you or your 6 LLCs would be paid for your services in 7 connection with this research agreement? 8 A. That's correct. 9 Q. Other than the \$300,000 payment, was 10 there any other payments from Strategic Vision to 11 you or one of your LLCs in connection with this 12 research agreement? 13 A. Yeah. I can provide those, the 14 documentation to that effect. 15 (*r) MR. GRENDI: Joe, I'm going to ask for 16 the production of Strategic Vision's records 17 with respect to these payments. 18 MR. SCHMIDT: Okay. I assume you're 19 going to follow up with a letter or 20 something detailing this, right? 21 MR. GRENDI: Once we get the 22 transcript, we can do that. 23 MR. SCHMIDT: Okay. Because we 24 obviously owe you a letter from the last 25 deposition too.</p>
<p style="text-align: right;">Page 39</p> <p>1 Vision was half of the money that comes in 2 through this research agreement would be paid 3 either to you or one of your LLCs? 4 A. Half of the profits, yes. 5 Q. Profits, okay. So not just revenue. 6 Let's just say if the agreement was a million 7 dollars, you wouldn't get 500,000. You would get 8 some smaller sum based on either overhead or 9 other costs? 10 A. That's correct. 11 Q. How did you plan on accounting for 12 that? 13 A. Pardon. There were also expenses paid 14 to one of my LLCs for the purpose of rerouting 15 this through a few channels to avoid detection by 16 the Chinese. 17 Q. Which LLC was that? 18 A. That was one that French and I both set 19 up called Georgetown Research LLC. 20 Q. How much money was sent to Georgetown 21 Research LLC? 22 A. I have the statements. I'm guessing 23 \$300,000, I'm guessing, but I can provide the 24 statements. 25 Q. With respect to this agreement to split</p>	<p style="text-align: right;">Page 41</p> <p>1 MR. GRENDI: I understand. 2 Q. You said you have records concerning 3 these transactions? 4 A. The bank statements, yes. 5 Q. Just ballpark, all in, do you know 6 about how much money was transferred from 7 Strategic Vision to you or your LLCs in 8 connection with this research agreement? 9 A. I would say about that \$300,000 figure 10 that I was referring to before was probably it, 11 but I would have to check, because the LLCs were 12 also used as a pass-through, by design. 13 Q. Just in connection with this research 14 agreement, how many different LLCs were used? 15 A. My own that I control? 16 Q. Yes. 17 A. Three. 18 Q. What are those three? 19 A. That would be Oceanic Advisors, Liberty 20 Tree Partners, although I don't recall if there 21 was a payment made to Liberty Tree, but that 22 would have been one, and then Georgetown Research 23 which was our joint LLC. 24 Q. So why were these funds transferred to 25 your LLCs?</p>

EASTERN PROFIT CORPORATION LIMITED vs STRATEGIC VISION US, LLC  
J. Michael Waller on 02/08/2019

<p style="text-align: right;">Page 42</p> <p>1 A. So that we could make payments to start 2 team 1 and to cover all related expenses in 3 starting up this project. 4 Q. So these payments were not for, as you 5 described it earlier, splitting the profits? 6 A. That was part of the start-up. We did 7 not deplete the funds. There were funds left 8 over, but there were all kinds of costs involved 9 to start this up. So anything involved in 10 starting up this project, we did through this 11 means. 12 Q. I understand. Correct me if I'm wrong. 13 The payments that were made to your three LLCs 14 were made in connection with you or your LLCs 15 retaining team 1? 16 A. Yes. To building and retaining team 1 17 and all of its equipment and all associated 18 expenses. 19 Q. Did there come a time when you received 20 payment for splitting the profits? 21 A. Yes. I took some of the funds at that 22 same time to pay for my own expenses and my own 23 work, but it was not a splitting of the profits. 24 Q. Right. What I'm asking about is not 25 these payments that you just described. What I'm</p>	<p style="text-align: right;">Page 44</p> <p>1 Strategic Vision account, so I wouldn't know. I 2 imagine there were some residual things, so the 3 profits were not fully – to the extent there 4 were profits, they were not fully split. 5 We were cheated out of the first 6 month's work and the second month's work, and 7 then his failure to give 30-days' notice because 8 we were left in limbo. So as far as we're 9 concerned, there were no profits because Miles 10 Kwok, or Guo cheated us out of our earnings. 11 Q. So you don't expect to get any money 12 from French Wallop for any profit in connection 13 with this engagement? 14 A. There's no profit if we were cheated. 15 Q. I would appreciate it if you would just 16 answer the question directly. Was there no 17 profit from this engagement for you or Strategic 18 Vision? 19 A. You have to define "profit." What were 20 our opportunity costs? What were our losses from 21 doing work and preparing work for them for which 22 we were not compensated, or for not taking on 23 other jobs because we were working on Guo's work 24 for which he did not compensate us? So it's an 25 academic question on what constitutes profit.</p>
<p style="text-align: right;">Page 43</p> <p>1 asking about is was there ever another time when 2 you received money from Strategic Vision for 3 splitting the profits from this research 4 agreement? 5 A. Yeah, during the first month of work. 6 Q. How much was that payment for? 7 A. I don't remember. I have the records. 8 Q. But you did – you do recall receiving 9 a payment from Strategic Vision for splitting the 10 profits? 11 A. To one of the LLCs. 12 Q. Is that a "yes," though? 13 A. "Splitting the profits" is the wrong 14 term. It was for the first months of our own 15 compensation. One of the issues was we wanted to 16 be paid one month in advance. Guo objected. We 17 still had to pay ourselves for that month's work. 18 I'm speaking for myself. I'm not speaking for 19 Ms. Wallop or Strategic Vision. 20 Q. I understand. I just want to make the 21 record clear. Did there ever come a time when 22 the profits from this research agreement were 23 split between you and Strategic Vision? 24 A. Yes, but there are still funds left 25 that were not spent. I don't have access to the</p>	<p style="text-align: right;">Page 45</p> <p>1 Q. Let me ask you this. Do you expect 2 Strategic Vision to send you any payment in the 3 future in connection with, quote-unquote "profit" 4 from this engagement? 5 A. If Guo pays what he owes yes, I do. He 6 owes us \$2 million in failure to pay and failure 7 to give notice that he was terminating the 8 contract in 30 days. If and when he pays that, 9 yes, I expect to receive my share of the profit. 10 That's how we operate. 11 Q. Let's just say the only money that 12 Strategic Vision has is the million dollars. Is 13 there any profit to split? 14 A. Not anymore, not with this legal case. 15 Q. Did you and Strategic Vision ever 16 detail how profit would be defined, in terms of 17 splitting the profits from this engagement? 18 A. In terms of dividing up the revenues 19 from this engagement, it would be a 50/50 split 20 after expenses. 21 Q. Expenses, okay. What expenses would 22 those be? 23 A. The research teams, any travel, any 24 legal, any contractors, any equipment, any 25 leases, any security measures, anything related</p>

EASTERN PROFIT CORPORATION LIMITED vs STRATEGIC VISION US, LLC  
J. Michael Waller on 02/08/2019

<p style="text-align: right;">Page 46</p> <p>1 to running the business.</p> <p>2 Q. And I guess legal fees –</p> <p>3 A. To executing this contract.</p> <p>4 Q. I would guess legal fees are apparently</p> <p>5 a part of that?</p> <p>6 A. It's a part of running a business.</p> <p>7 Q. I'm asking about what you and –</p> <p>8 A. Legal fees are part of running a</p> <p>9 business, yeah. They happen to be, yeah.</p> <p>10 MR. GRENDI: Let's do number 2.</p> <p>11 (Waller Exhibit 2, Research Agreement</p> <p>12 December 29, 2017, marked for</p> <p>13 identification.)</p> <p>14 Q. Mr. Waller, do you recognize this</p> <p>15 document?</p> <p>16 A. Yes.</p> <p>17 Q. What is it?</p> <p>18 A. This is the research agreement that I</p> <p>19 was referring to before dated December 29th.</p> <p>20 It's the signed and initialed agreement between</p> <p>21 French Wallop and Yvette Wang, who was working as</p> <p>22 the agent of Miles Kwok, dated January 6, 2018.</p> <p>23 Q. So this is different from the draft</p> <p>24 agreement I had showed you earlier, Exhibit 1?</p> <p>25 A. It's not the exact same agreement.</p>	<p style="text-align: right;">Page 48</p> <p>1 research subjects are referred to as "Fish." Do</p> <p>2 you see that on – call it Eastern 7? It's the</p> <p>3 third page.</p> <p>4 A. Yes.</p> <p>5 Q. Where does that term "fish" come from?</p> <p>6 A. That was Guo's term. It's admittedly a</p> <p>7 very weird term to put in a contract.</p> <p>8 Q. You kind of anticipated my follow-up</p> <p>9 question. Have you ever done a contract that</p> <p>10 referred to research subject as "fish"?</p> <p>11 A. No.</p> <p>12 Q. So this is the first one that you</p> <p>13 ever –</p> <p>14 A. For fish?</p> <p>15 Q. Yes.</p> <p>16 A. Yes. I mean, I wasn't going to deliver</p> <p>17 him flounder as a deliverable, no.</p> <p>18 Q. Right. And the contract refers to</p> <p>19 "fish in the tank per year." Do you see that?</p> <p>20 A. Yes.</p> <p>21 Q. What does the "tank" mean in that</p> <p>22 context?</p> <p>23 A. This was a metaphor that Guo had in our</p> <p>24 discussions with him about the number of people</p> <p>25 to be researched at any given time and in the</p>
<p style="text-align: right;">Page 47</p> <p>1 Q. So there was subsequent negotiation of</p> <p>2 this agreement after the first draft that we've</p> <p>3 showed you was drafted?</p> <p>4 A. This draft, this January 1st draft,</p> <p>5 Exhibit Waller 1 is dated after the signed</p> <p>6 agreement, Waller Exhibit 2, so I don't know what</p> <p>7 you mean by "first draft."</p> <p>8 Q. But you don't know if Exhibit 1 was</p> <p>9 drafted before or after the signed agreement?</p> <p>10 A. I don't know. It would appear here you</p> <p>11 fill in the blanks, and there are several blank</p> <p>12 areas. I have not read the text to compare the</p> <p>13 text, but obviously the December 29th agreement</p> <p>14 looks more complete than the one that's dated</p> <p>15 January 1st.</p> <p>16 Q. Were you physically present when</p> <p>17 Exhibit 2 was signed?</p> <p>18 A. No.</p> <p>19 Q. Were you telephonically involved or</p> <p>20 telephonically present when this Exhibit 2 was</p> <p>21 signed?</p> <p>22 A. No. I was not present in any way,</p> <p>23 shape or form, human or electronic.</p> <p>24 Q. Good to know.</p> <p>25 Just looking at the agreement, the</p>	<p style="text-align: right;">Page 49</p> <p>1 three categories outlined in the contract. So if</p> <p>2 you had ten individuals and three categories,</p> <p>3 there would be 30 – a set of 30. But on</p> <p>4 occasion, it would be impossible to research</p> <p>5 certain of them, so you might only research eight</p> <p>6 or he might want 12.</p> <p>7 There would still be the same number of</p> <p>8 deliverables, though, so it wouldn't be all three</p> <p>9 items on all of them. It might be only one or</p> <p>10 two on some or there might be more people. So</p> <p>11 you have a, in his words, a water level in the</p> <p>12 tank that is constant.</p> <p>13 Q. Would that also perhaps be referred to</p> <p>14 as a "waterline"? Have you ever heard that term</p> <p>15 "waterline"?</p> <p>16 A. I don't know the difference.</p> <p>17 Q. So you and Ms. Wallop had never heard</p> <p>18 of this kind of jargon in connection with the</p> <p>19 investigatory research project?</p> <p>20 A. Never. It was very strange.</p> <p>21 Q. Did you guys ever talk about how</p> <p>22 strange you thought that was?</p> <p>23 A. Wouldn't you? Yes.</p> <p>24 Q. What was the nature of that</p> <p>25 conversation between you and Ms. Wallop about</p>



EASTERN PROFIT CORPORATION LIMITED vs STRATEGIC VISION US, LLC  
J. Michael Waller on 02/08/2019

<p style="text-align: right;">Page 50</p> <p>1 these terms being strange?</p> <p>2 A. Any normal person would have a -- you</p> <p>3 can imagine, if that was his way to quantify the</p> <p>4 agreement and we put it down, then that was okay.</p> <p>5 He was the client. We all understood each other.</p> <p>6 If you had a, let's say a body of ten names times</p> <p>7 three issues per -- so that's 30 deliverables --</p> <p>8 and you couldn't find information on five of</p> <p>9 them, you go to the next five, but you're really</p> <p>10 researching 15 people but not on every single</p> <p>11 category. So you would have 15 people for, say,</p> <p>12 an average of two categories per for a total of</p> <p>13 15, and that's what the fish would be. Or the</p> <p>14 subject would be the fish times three.</p> <p>15 Q. Let me ask you this, then. What term</p> <p>16 would you normally use in a research agreement</p> <p>17 like this to describe what is referred to here as</p> <p>18 the "fish" or the "tank" or the "waterline"?</p> <p>19 A. I would say "subject" or "individual"</p> <p>20 or "target," something more...</p> <p>21 Q. And in other agreements you used those</p> <p>22 terms, not fish?</p> <p>23 A. Never, no, no. In my mind I thought it</p> <p>24 was sort of just a Chinese way of illustrating</p> <p>25 something and it was a cultural difference, and</p>	<p style="text-align: right;">Page 52</p> <p>1 it. We tried to explain all the methodology to</p> <p>2 him, and he didn't want to know the methodology.</p> <p>3 He just wanted the product.</p> <p>4 MR. GRENDI: Do you need a break?</p> <p>5 MR. SCHMIDT: No.</p> <p>6 Q. You said before you've worked on two</p> <p>7 similar projects with Strategic Vision?</p> <p>8 A. Not similar to this, but similar in</p> <p>9 terms of opposition research or messaging.</p> <p>10 Q. So let's drill down on that. Have you</p> <p>11 ever performed investigatory research for</p> <p>12 Strategic Vision that entailed what's described</p> <p>13 in the research agreement as financial, forensic,</p> <p>14 historical research?</p> <p>15 A. Not for Strategic Vision. That's why</p> <p>16 she brought me on board, to perform that type of</p> <p>17 work.</p> <p>18 Q. What about for current tracking</p> <p>19 research? The same answer or different?</p> <p>20 A. Current tracking, no. I had not done</p> <p>21 that. That's what we got the team members to do.</p> <p>22 Q. What about social media research?</p> <p>23 A. Yes.</p> <p>24 Q. Let's just talk about -- going to</p> <p>25 Eastern 5 -- the financial, forensic historical</p>
<p style="text-align: right;">Page 51</p> <p>1 we went along, okay, if you want to call it</p> <p>2 "fish," we'll call it "fish."</p> <p>3 Q. So you or Ms. Wallop didn't object to</p> <p>4 this terminology?</p> <p>5 A. No. If that's the way he understood</p> <p>6 it, then that was fine with us.</p> <p>7 Q. In your view, is Strategic Vision very</p> <p>8 experienced in providing the research</p> <p>9 contemplated by this agreement?</p> <p>10 A. I don't know what Strategic Vision has</p> <p>11 done in the past on this, but in terms of French</p> <p>12 Wallop being able to deliver on her contacts in</p> <p>13 the political and policy and diplomatic and</p> <p>14 intelligence communities, absolutely, yes. In</p> <p>15 terms of my capabilities to be brought on as a</p> <p>16 contractor with Strategic Vision for the</p> <p>17 remainder of the deliverables, absolutely, yes.</p> <p>18 Q. Did you convey that confidence in</p> <p>19 providing this sort of research to Mr. Guo or</p> <p>20 Lianchao or Yvette Wang prior to the execution of</p> <p>21 this agreement?</p> <p>22 A. Yes, we explained it explicitly. In</p> <p>23 fact, we were so detailed in explaining it, Guo</p> <p>24 said, "I don't want to know it. I don't want to</p> <p>25 know it. Just go do it." He got impatient about</p>	<p style="text-align: right;">Page 53</p> <p>1 research. I'm sorry, the document is Eastern 5</p> <p>2 on the bottom right corner there. It's page 1.</p> <p>3 When I'm referring to either "Eastern"</p> <p>4 or "Strategic Vision" X number, I'm talking about</p> <p>5 the Bates number that's in the right-hand corner</p> <p>6 there, just so you can follow along.</p> <p>7 A. Okay.</p> <p>8 Q. Do you see financial, forensic</p> <p>9 historical research there?</p> <p>10 A. Yes.</p> <p>11 Q. This description of it, was that</p> <p>12 drafted in conjunction with a conversation you</p> <p>13 had with plaintiff here?</p> <p>14 A. I would say conversations plural and</p> <p>15 with Lianchao who was acting as his agent.</p> <p>16 Q. Who is Lianchao Han?</p> <p>17 A. Lianchao Han was a former Chinese</p> <p>18 foreign ministry official who was a political</p> <p>19 prisoner in China. He spent four years doing</p> <p>20 slave labor in the Gulag there, breaking rocks.</p> <p>21 He became involved in the democracy</p> <p>22 movement. He was a Tiananmen Square student</p> <p>23 protest organizer. I first met him about 30</p> <p>24 years ago. I did not keep contact with him, but</p> <p>25 we traveled in the same universe of people, so we</p>

EASTERN PROFIT CORPORATION LIMITED vs STRATEGIC VISION US, LLC  
J. Michael Waller on 02/08/2019

<p style="text-align: right;">Page 54</p> <p>1 had a familiarity with each other and each 2 other's work. 3 He was working with Guo. Guo was 4 trying to hire him. He was not, to my knowledge, 5 paid by Guo and did not want to be, but he was 6 acting as Guo's agent to set up this arrangement 7 and to serve as Guo's interpreter. 8 Q. Does Mr. Guo speak English well? 9 A. He speaks it well but not fluent. You 10 can have a conversation with him and he can read 11 it fine, but he cannot – he would need 12 assistance of an interpreter. 13 Q. So you've spoken to Mr. Guo in English 14 before? 15 A. Yes. 16 Q. But did you have any kind of difficulty 17 understanding what he was saying or struggle with 18 his English? 19 A. Yeah, he would struggle with his 20 English, and that's why Lianchao or Yvette would 21 be present during the meetings. 22 Q. So Lianchao and Yvette were 23 interpreters for Mr. Guo, as you understood it? 24 A. In addition to serving as his agents to 25 work with us.</p>	<p style="text-align: right;">Page 56</p> <p>1 be defined was never intended as a finished 2 analytical essay or bound type of report that one 3 would be accustomed to in a legal or business or 4 an academic environment. It was simply raw data 5 passed on a USB thumb drive, a flash drive from 6 team 1 through me straight to Guo or his agent. 7 He did not want an analytical product 8 in terms of the short-term reports. 9 Q. Does this research agreement define 10 what a progress report will have in it? 11 MR. SCHMIDT: Objection. 12 A. I mean, it says what it says, a 13 progress report. I want to know the status. How 14 are things? Well, great. Everybody's recruited. 15 They're in place. They've begun working. It 16 takes X number of days to do this, which we told 17 him in advance. We told him something specific 18 would take six days to do. 19 By day 2, Guo was getting impatient. 20 So we were giving him the reports to let him know 21 how the team was coming together. And then once 22 the team started digging up information – it's 23 an extremely time-consuming task. He knew that, 24 so we gave him the information on the sticks 25 right after he asked for it.</p>
<p style="text-align: right;">Page 55</p> <p>1 Q. Just going back to the financial, 2 forensic historical research, has Strategic 3 Vision provided that service in the past? 4 A. I can't speak for Strategic Vision. 5 Q. What about for you personally? 6 A. Yes, as part of another – as part of 7 other teams. 8 Q. I just want to talk about the reports 9 referenced on the next page concerning financial, 10 forensic historical research. 11 Do you see the first full paragraph on 12 Eastern 6, "Contractor will produce a progress 13 report"? 14 A. Yes. 15 Q. What did you understand a progress 16 report would include or entail? 17 A. The progress reports were to be on 18 roughly a weekly basis to let him know the 19 progress of how the project was going underway. 20 Initially, the progress reports were simply this 21 is the progress. We're setting up the team. We 22 got the funds moved. We've recruited the right 23 people. They're in place and so forth. 24 And then the – so those were the 25 progress reports, and then the, quote, reports to</p>	<p style="text-align: right;">Page 57</p> <p>1 Q. Right. I just want to understand. Do 2 you recall a specific discussion with Mr. Guo or 3 Lianchao or Yvette regarding what would be in a 4 progress report prior to the execution of this 5 research agreement? 6 A. Yeah, the progress report is simply 7 what's the status of the project. 8 Q. That's not exactly what I asked. 9 A. It would be a verbal – it would be a 10 verbal status report and anything on a stick that 11 the researchers came up with in its raw form, not 12 in an analyzed synthesized form. 13 Q. I think you're missing my question a 14 little bit, so let me just ask it again. 15 Do you recall telling Mr. Guo or 16 Yvette Wang or Mr. Lianchao what you understood 17 would be in a progress report? 18 A. Yes. 19 Q. When was that? 20 A. That was in – that was before the 21 contract in December, and it was after the 22 contract was signed. 23 Q. Let's talk about before. When was it 24 that you – well, who did you tell about what a 25 progress report would entail before the contract</p>



EASTERN PROFIT CORPORATION LIMITED vs STRATEGIC VISION US, LLC  
J. Michael Waller on 02/08/2019

<p style="text-align: right;">Page 58</p> <p>1 was signed?</p> <p>2 A. For the first part of it, for the setup</p> <p>3 part of it, it was merely to tell him the status</p> <p>4 of putting the team together. It's a very</p> <p>5 complicated task to do. And because of his own</p> <p>6 security requirements, which was that everything</p> <p>7 be delivered on a USB port physically – a USB</p> <p>8 drive physically and not done online – nothing</p> <p>9 would be done over the internet – that meant</p> <p>10 physically traveling to a European country to</p> <p>11 pick up the drive and then returning to New York</p> <p>12 to deliver it to Guo or one of his agents.</p> <p>13 Q. Mr. Waller, I'm not trying to be</p> <p>14 difficult here. I'm trying to understand when</p> <p>15 you were told – or when you told, I'm sorry.</p> <p>16 You said before you told either Mr. Guo or</p> <p>17 Lianchao or Ms. Yvette Wang about what a weekly</p> <p>18 progress report included.</p> <p>19 A. Right.</p> <p>20 Q. And I'm asking you, when did you do</p> <p>21 that and who did you tell?</p> <p>22 A. It would have been in December at some</p> <p>23 point prior to the contract.</p> <p>24 Q. Okay.</p> <p>25 A. But it was a casual, it was a casual</p>	<p style="text-align: right;">Page 60</p> <p>1 A. Oh, no, it was never spelled out.</p> <p>2 Q. What about –</p> <p>3 A. Now, for a progress report versus</p> <p>4 reports. Those are two different things.</p> <p>5 Q. I understand. I was going to ask you</p> <p>6 next about what the financial, forensic research</p> <p>7 preliminary report was.</p> <p>8 A. The preliminary report was the status</p> <p>9 of how the research is going, how we set it up,</p> <p>10 where we're digging, how we're digging, what we</p> <p>11 were able to find, and what we were able to not</p> <p>12 find.</p> <p>13 One of the issues we anticipated – and</p> <p>14 it's addressed here in the contract two or three</p> <p>15 times – is there will be times where it's</p> <p>16 impossible to find information or extremely</p> <p>17 difficult or time-consuming. It will take weeks</p> <p>18 or months to find certain information, and this</p> <p>19 was understood.</p> <p>20 So we would report back to him. In the</p> <p>21 initial stage, we just started up this operation.</p> <p>22 We don't have the – there was never an</p> <p>23 expectation that there would be all the</p> <p>24 information in hand right away. He developed</p> <p>25 that expectation afterward when he was making</p>
<p style="text-align: right;">Page 59</p> <p>1 thing. We're going to give you a progress</p> <p>2 report. He was concerned that he was going to</p> <p>3 get ripped off, so he wanted proof that he wasn't</p> <p>4 getting ripped off. So he wanted to know the</p> <p>5 status of everything as we were putting</p> <p>6 everything together. That's fair enough.</p> <p>7 So if he were to say – or he did say</p> <p>8 and through Lianchao and then through Yvette, –</p> <p>9 although there was a difference between the</p> <p>10 two – what's the status of things. So we would</p> <p>11 tell him verbally the status of the situation.</p> <p>12 Then that would get into the second type of</p> <p>13 report, preliminary report which was on that USB</p> <p>14 drive.</p> <p>15 Q. What did you describe would be in a</p> <p>16 progress report to Mr. Guo or Lianchao or</p> <p>17 Ms. Yvette prior to the execution of this</p> <p>18 agreement?</p> <p>19 A. The status of the project as of that</p> <p>20 day.</p> <p>21 Q. That's all?</p> <p>22 A. Yeah, very simple.</p> <p>23 Q. So you didn't describe it in any kind</p> <p>24 of detail as to the progress report will have</p> <p>25 these metrics?</p>	<p style="text-align: right;">Page 61</p> <p>1 demands.</p> <p>2 Q. Let me just hop in.</p> <p>3 MR. SCHMIDT: Are you finished? Just</p> <p>4 let him finish his answer and then you can</p> <p>5 follow up.</p> <p>6 Do you have anything further?</p> <p>7 A. Yes, he kept deviating in what he</p> <p>8 wanted. He never made it clear to us precisely</p> <p>9 what he wanted. He's an erratic personality</p> <p>10 anyway, so we learned to expect that.</p> <p>11 Q. Mr. Waller, I just want you to answer</p> <p>12 the question I'm asking you.</p> <p>13 A. Yes.</p> <p>14 Q. I just asked you before what would be</p> <p>15 in a preliminary report. That's what I'm trying</p> <p>16 to get at here.</p> <p>17 A. Versus a progress report?</p> <p>18 Q. Yes.</p> <p>19 A. A preliminary report is simply what did</p> <p>20 the research team dig up, the raw data that they</p> <p>21 dug up on the USB port. That is the, quote,</p> <p>22 report. No analytical product, no printed</p> <p>23 product. He didn't want paper.</p> <p>24 A lot of the material was in Mandarin.</p> <p>25 We did not have a team for that. That was</p>

EASTERN PROFIT CORPORATION LIMITED vs STRATEGIC VISION US, LLC  
J. Michael Waller on 02/08/2019

<p style="text-align: right;">Page 62</p> <p>1 stipulated also in the contract. We ended up 2 needing one. So it was just the raw data 3 regardless of how much or how little, as we were 4 building it up. 5 Q. Before the contract was signed, do you 6 recall ever explaining what would be in a 7 preliminary report to Mr. Guo or Lianchao or 8 Yvette Wang? 9 A. Yes. 10 Q. When was that? 11 A. Sometime in December. 12 Q. And this was you personally? 13 A. Yeah, yes, yes, because I was 14 supervising team 1. 15 Q. Was there any disagreement about what a 16 preliminary report should be constituted by 17 between you and Mr. Guo or Waller – sorry, 18 Mr. Guo, Lianchao or Yvette? 19 A. Not prior to the contract. 20 Q. So you didn't have a discussion about 21 what would be in a preliminary report? 22 A. Yes. Send what you have. Send what 23 you come up with. 24 Q. That was after the execution of the 25 agreement, right?</p>	<p style="text-align: right;">Page 64</p> <p>1 A. I am. 2 Q. I appreciate that. 3 A. You're trying to pin me down on 4 something I've already answered five times, which 5 is that the report is simply the data that we 6 got, for better or for worse, delivered on a USB 7 drive. That's it; no more, no less. 8 Q. What about the comprehensive historical 9 research report within three months? 10 A. That would be all of the information 11 collected up to that period and collated. 12 Q. And again, I want to ask about whether 13 you had a discussion about what would be in a 14 comprehensive historical research report prior to 15 the execution of this agreement. 16 Do you recall having that discussion? 17 A. Yes, that was just delivering him the 18 raw data, but collated. Let's say, for example, 19 we dig up a lot of information on various of the 20 individuals, but it's not collated. We simply 21 collate it. So in our first deliverable to him, 22 we had the electronic files for each of the 15 23 targets, or fish, so we were going to build out 24 from that. 25 Q. So in your mind, I think you're talking</p>
<p style="text-align: right;">Page 63</p> <p>1 A. No, that was before. The preliminary 2 report is send us what you found. For better or 3 for worse, send it. If it's a little or a lot, 4 send it. 5 Q. So you and Eastern discussed that? 6 A. Not Eastern. With Guo. I discussed it 7 directly with Guo and/or through Lianchao or 8 Yvette. 9 Q. I just want to be clear. You're saying 10 that was before the execution agreement? 11 A. Yes. 12 Q. Do you recall where that representation 13 or discussion occurred? 14 A. That would have been with him directly 15 at his residence, with either – French Wallop 16 was present whenever I was, and it would have 17 either been with Lianchao and/or Yvette. 18 Sometimes both were in the room. Sometimes Kwok 19 dismissed Yvette because he didn't trust her. So 20 on sensitive matters, he kept her out of a lot of 21 these things because he said he didn't trust her. 22 Q. Mr. Waller, I'm just going to ask 23 again. Please just answer the question. You're 24 offering a lot of other information. I know 25 you're trying to be helpful.</p>	<p style="text-align: right;">Page 65</p> <p>1 about the January 30, 2018 delivery that you made 2 to Yvette Wang at Tracks Bar in New York City? 3 A. Yes. 4 Q. And you're saying that data – 5 A. Repeat that because that would have 6 been the second deliverable. 7 Q. You're saying that that was a – what 8 kind of report was that? 9 A. That was a USB drive with about 60 or 10 80,000 lines of code, of which about 16 lines of 11 code were useful. I notified them in advance. I 12 said to them, "No sense in going to Europe just 13 for that because only 16 lines are useful. Let 14 us work those 16 lines." They said, "No, we want 15 to have it anyway." So I went over to Europe, 16 picked it up and brought it back. 17 Q. In your mind, though, what kind of 18 report was that USB flash drive that you gave to 19 Yvette Wang on or about January 30, 2018? 20 A. That was a report that we're referring 21 to right here. 22 Q. Which one? Is it a progress report? A 23 preliminary report? A comprehensive report? A 24 research report? 25 A. That would have been a preliminary</p>

EASTERN PROFIT CORPORATION LIMITED vs STRATEGIC VISION US, LLC  
J. Michael Waller on 02/08/2019

<p style="text-align: right;">Page 66</p> <p>1 report. That would have been one of the weekly 2 reports. 3 Q. Have you ever provided reports of this 4 nature to other clients in this format of 5 progress report, preliminary report, 6 comprehensive historical research report? 7 A. Progress reports, of course, yes. 8 Preliminary reports, of course, but in a 9 different way. It was not just raw data. It was 10 more defined. Then the comprehensive historical 11 research report, analogous reports to this type 12 of wording, yes. You can even say comprehensive 13 historical research report, yeah, that would be 14 fine. 15 Q. So in your mind, is this kind of like a 16 standard industry practice in terms of providing 17 investigatory research? 18 A. Yes. Now, where it's tailored to the 19 client, you're going to deviate from the 20 standard, like using the word "fish." 21 Q. What about the current tracking 22 research? You see a little bit lower down there, 23 there's a discussion of producing monthly 24 reports? 25 A. Yes.</p>	<p style="text-align: right;">Page 68</p> <p>1 physically go to Europe to pick up the drive and 2 then deliver it back to Guo or his agents. 3 Q. Would you do any analytical work or 4 analysis of the report itself, or did you just, 5 as you described, just kind of pass it along? 6 A. I simply acted as a pass-through for 7 delivering that. We had envisioned doing -- in 8 terms of analytical work, if there was to be 9 paper as opposed to electronic information, I 10 would be collecting that and making sense of 11 that, but none of the computer work. 12 Q. What about the preliminary reports? 13 Would you provide any analysis or use any of your 14 kind of experience in this field to create or 15 edit or do anything with those reports? 16 A. We had talked about doing that. Guo 17 specifically instructed us not to. 18 Q. So again, you didn't edit or provide 19 any insight in terms of the data that you were 20 getting from team 1. You just, again, passed it 21 along? 22 A. Yes. He didn't want it. He just 23 wanted it passed straight to him. Now -- 24 Q. Go ahead. 25 A. Let me put a caveat on that.</p>
<p style="text-align: right;">Page 67</p> <p>1 Q. Except the first month where there will 2 be weekly reports? 3 A. Right. 4 Q. What was your understanding of what the 5 weekly reports would entail? 6 A. First it would be a status report until 7 we were able to make the deep dives into the 8 research. 9 Q. What about the monthly reports? 10 A. That would basically be a compilation 11 of the weekly reports and then anything that was 12 integratable in its raw form, we would submit. 13 Q. In terms of completing -- let's just 14 start with a weekly report. How would that be 15 completed? In other words, who does the work to 16 put together that report? 17 A. Team 1. Team 1 did the work because it 18 was simply raw data. There was no analytical 19 product. 20 Q. What was your role in connection with 21 any weekly reports? What would you do? 22 A. I was the one you would -- I was the 23 liaison with team 1. I would deliver Guo's 24 instructions to team 1. I would get any 25 information back from them, and then I would</p>	<p style="text-align: right;">Page 69</p> <p>1 Q. Sure. 2 A. When we found a dead end or we found an 3 issue like bad names, names that were either not 4 real or spelled wrong or seemed to be the same 5 name among one or more different people, or two 6 or more different people, whether it's two people 7 with the same name or one person using two 8 persona, or if we found that some of the 9 information he gave us was false or inaccurate, 10 that's when I would get involved and deliver that 11 to him, as well as whatever information. 12 For example, he gave us copies of 13 passports of certain of the targets that he 14 wanted, and so we checked and found that some of 15 the passports were false. So that was an 16 analytical piece of work that I did or had other 17 team members do apart from this. I delivered 18 that separately, so that's apart from the raw 19 data. We were trying to be as comprehensive as 20 we could for him. 21 Q. So in other words, in terms of applying 22 your experience and background in this field, 23 that's where you would kind of participate in 24 focusing or refocusing one of these reports? 25 A. Right. Or if the team had said, we</p>

EASTERN PROFIT CORPORATION LIMITED vs STRATEGIC VISION US, LLC  
J. Michael Waller on 02/08/2019

<p style="text-align: right;">Page 70</p> <p>1 found a lot of -- we were able to get information 2 on one of the individuals in Kwok's list -- there 3 were, if I recall correctly, about 92 names -- he 4 wanted the top 15 to research. 5 But he did say some of the people 6 further down in this chain might be of 7 importance. If you find anything, let me know. 8 So we found, yeah, there's one guy, Frank Suen, 9 S-u-e-n, who was a particular -- became a 10 particular object of interest. So I delivered 11 that news to Kwok, and said, "This is the kind of 12 information they got on him. How do you want to 13 dig on him? What else would you like to find?" 14 That was all verbal. I delivered it. 15 So when you refer to "reports" in quotes, it was 16 verbal. But in person, either to Kwok directly 17 or to one of his two agents. 18 Q. So in terms of -- the reports didn't 19 have to be written? 20 A. Correct. 21 Q. What about your role in the 22 comprehensive historical research report? What 23 would you do for one of those reports? What 24 would you do? 25 A. First of all, the contract didn't last</p>	<p style="text-align: right;">Page 72</p> <p>1 this one, or the team went and did on its own. 2 Because it would take at least five 3 days or a week traveling, stopping what they're 4 doing, traveling to a common point in Europe, 5 coming back here, delivering, and then consulting 6 with Guo and his agents, and then going back to 7 deliver the information to team 1. That takes at 8 least a week just to deliver a message, round 9 trip. 10 So that would be immediate-term 11 reporting, say, weekly or monthly-type, quote, 12 reporting. The comprehensive one is now we got a 13 big picture of it. This is what we found. 14 Q. So you would be, let's say, 15 synthesizing the research for one of these 16 comprehensive reports? 17 A. Yeah, synthesizing what the team had 18 concluded or told me, but not synthesizing the 19 raw data that the teams came up with, yes. 20 Q. Got it. In terms of your relationship 21 with Strategic Vision, who was going to do 22 that -- let's call it -- report synthesis, or 23 that work? 24 A. Generally me. But what French Wallop 25 would do was she had her own contacts elsewhere</p>
<p style="text-align: right;">Page 71</p> <p>1 three months for that to be produced. The way in 2 working with any client is that things will adapt 3 and you find new problems or solutions or needs 4 or discoveries or whatever, opportunities, and 5 you think, how would you like this done. 6 So for the comprehensive historical 7 research report, it would be a summary of the raw 8 stuff that we got based on what the researchers 9 told us, but not a summary of the raw computer 10 data itself because Guo didn't want that 11 analyzed. Meaning we were able to track targets 12 1, 2, 7, 8, 9 well, and we got this level of work 13 here. Or we have some leads here, but it's going 14 to take longer than we expected. Some of these 15 people are impossible to find. Or this person 16 appears to be a false person. So that would be a 17 comprehensive report. 18 For the point of doing the actual 19 research for the short-term, we would bring that 20 up if there was trouble right away, which we did. 21 But for a comprehensive one when we're getting a 22 bigger picture of the type of research we're 23 doing and the universe of people being 24 researched, we're finding oh, we might be going 25 after a false target here. Let's go down after</p>	<p style="text-align: right;">Page 73</p> <p>1 throughout the U.S. government and other 2 governments. So what we did for 3 comprehensiveness of the research and to 4 double-check to make sure that we were on the 5 right path or not, we would consult with members 6 of -- or people associated with intelligence 7 services of the U.S. and other countries. 8 Q. I see. So it was kind of two -- 9 A. She can speak more to that. She had 10 most of those contacts. 11 Q. It sounds to me like it's two methods 12 of acquiring information? 13 A. More than two. 14 Q. Well, let's call it two categories. 15 There is the -- I'll call it Mr. Waller category 16 doing the work that you just described, and then 17 Ms. Wallop would do her category of research 18 using her network of people in politics or 19 government to get information. Is that fair to 20 say or do I have it wrong? 21 A. In a law firm, you get defense 22 attorneys and litigators, so you have different 23 people with different skills, but they're in the 24 same general field. 25 Q. Right. They're collaborating, but they</p>

EASTERN PROFIT CORPORATION LIMITED vs STRATEGIC VISION US, LLC  
J. Michael Waller on 02/08/2019

<p style="text-align: right;">Page 74</p> <p>1 kind of do different things?</p> <p>2 A. Right.</p> <p>3 Q. Got it.</p> <p>4 MR. GRENDI: Why don't we take a brief</p> <p>5 break and come back in five minutes.</p> <p>6 THE VIDEOGRAPHER: Off the record at</p> <p>7 11:28.</p> <p>8 (Whereupon, a short recess was taken.)</p> <p>9 THE VIDEOGRAPHER: Back on the record</p> <p>10 at 11:37.</p> <p>11 Q. Mr. Waller, just to remind you you're</p> <p>12 still under oath here.</p> <p>13 A. Yes.</p> <p>14 Q. Have you ever met anyone who works for</p> <p>15 Strategic Vision, other than Ms. Wallop?</p> <p>16 A. No.</p> <p>17 Q. Going back to this contract, Waller 2.</p> <p>18 Can you turn to Eastern 5, which is the first</p> <p>19 page. Do you see where it says, "Any and all</p> <p>20 materials provided by the client to the</p> <p>21 contractor will be treated with absolute</p> <p>22 confidentiality and will not be shared by the</p> <p>23 contractor with any other entity"?</p> <p>24 A. Yes.</p> <p>25 Q. Do you recall drafting this provision</p>	<p style="text-align: right;">Page 76</p> <p>1 nature of this contract because I am not, I am</p> <p>2 not part of Strategic Vision.</p> <p>3 Q. Right.</p> <p>4 A. But having been part of putting the</p> <p>5 arrangement together, there's a team that's the</p> <p>6 entity.</p> <p>7 Q. So you understood that Strategic Vision</p> <p>8 U.S. LLC also entailed whoever it is that they</p> <p>9 subcontracted work to?</p> <p>10 MR. SCHMIDT: Objection.</p> <p>11 A. Not even Mrs. Wallop knows the</p> <p>12 identities of many of the people on the team.</p> <p>13 Not even I know some of them. That's how tight</p> <p>14 we kept it. Guo gave us the research material</p> <p>15 that, in order to execute the contract, we had to</p> <p>16 provide to the people doing the research.</p> <p>17 Q. But you don't know who those people</p> <p>18 are, the people doing the research?</p> <p>19 A. Not all of them.</p> <p>20 Q. Some of them?</p> <p>21 A. Some of them, yes.</p> <p>22 Q. And who were the people doing the</p> <p>23 research that you know of?</p> <p>24 A. I cannot provide the identities of</p> <p>25 team 1 for reasons that we explained before.</p>
<p style="text-align: right;">Page 75</p> <p>1 into the agreement, or how it got in there?</p> <p>2 A. No.</p> <p>3 Q. Does Strategic Vision share the</p> <p>4 information from the client with other entities?</p> <p>5 A. Only those who are part of the</p> <p>6 contract, to execute the contract.</p> <p>7 Q. But there were entities other than</p> <p>8 Eastern Profit and Strategic Vision that receive</p> <p>9 the materials from the client, which is --</p> <p>10 A. The research orders, yes.</p> <p>11 Q. So those were other entities. They're</p> <p>12 not part of Strategic Vision?</p> <p>13 A. They're part of the Strategic Vision</p> <p>14 team, so they would be included.</p> <p>15 Q. They're not actually the same entity as</p> <p>16 Strategic Vision, legally speaking, right?</p> <p>17 MR. SCHMIDT: Objection.</p> <p>18 Q. If you know?</p> <p>19 A. They're part of the same team.</p> <p>20 Q. So in your mind, "team" is what the</p> <p>21 contractor is defined by in this agreement?</p> <p>22 A. Yes.</p> <p>23 Q. So it says "Strategic Vision" up top</p> <p>24 here as the contractor, correct?</p> <p>25 A. Yes. I cannot speak for the signed</p>	<p style="text-align: right;">Page 77</p> <p>1 Team 2, we --</p> <p>2 Q. Hold on. I just want to maintain that</p> <p>3 we don't think that that's -- this is a lawyer</p> <p>4 part -- a legitimate objection. But in light of</p> <p>5 the procedural posture of our motion to compel</p> <p>6 request, I'll allow it.</p> <p>7 I'm sorry, continue with your answer.</p> <p>8 A. Team 2 was a company in Addison, Texas</p> <p>9 called ASOG. I believe it is American Special</p> <p>10 Operations Group, or words to that effect, based</p> <p>11 in Addison, Texas. That was team 2.</p> <p>12 Q. Sitting here today, you refuse to tell</p> <p>13 me who's on team 1?</p> <p>14 A. I decline to tell you.</p> <p>15 MR. SCHMIDT: Objection. Just be</p> <p>16 clear, with respect to team 1, do you</p> <p>17 actually know the members or do you just</p> <p>18 know the intermediary?</p> <p>19 A. I only know the team leader.</p> <p>20 MR. SCHMIDT: That's all what I wanted</p> <p>21 to clarify for the record in case we do a</p> <p>22 motion to compel later.</p> <p>23 Q. You know the leader of who team 1 is?</p> <p>24 A. Yes.</p> <p>25 Q. But sitting here today, you refuse to</p>

EASTERN PROFIT CORPORATION LIMITED vs STRATEGIC VISION US, LLC  
J. Michael Waller on 02/08/2019

<p style="text-align: right;">Page 78</p> <p>1 tell me that?</p> <p>2 A. Yes.</p> <p>3 Q. Why is it that you can't tell me who</p> <p>4 the leader of team 1 is?</p> <p>5 A. Because the leader of team 1 lives in a</p> <p>6 very high-risk area where there are a lot of very</p> <p>7 bad actors who can cause physical harm, including</p> <p>8 the worst kinds of violence you can imagine.</p> <p>9 Q. Did you promise the leader of team 1</p> <p>10 not to disclose his identity?</p> <p>11 A. Yes.</p> <p>12 Q. Is that a promise that was made in</p> <p>13 writing or orally? How was it made?</p> <p>14 A. We do everything by handshake as much</p> <p>15 as we can. So that was literally a handshake</p> <p>16 agreement.</p> <p>17 Q. That was an agreement between you and</p> <p>18 the leader of team 1?</p> <p>19 A. Yes.</p> <p>20 Q. Does Strategic Vision know the name of</p> <p>21 the leader of team 1?</p> <p>22 MR. SCHMIDT: Objection.</p> <p>23 A. You would have to ask Strategic Vision.</p> <p>24 Q. So you never talked to –</p> <p>25 A. I can't pretend to speak for Strategic</p>	<p style="text-align: right;">Page 80</p> <p>1 A. It's all based on trusting the team.</p> <p>2 Q. So you know that team 1 only provides</p> <p>3 genuine information?</p> <p>4 A. They provide – I know from the team 1</p> <p>5 leader that all the information they dug up was</p> <p>6 legitimate information that they did not</p> <p>7 manufacture or fabricate. It was just raw data.</p> <p>8 As to the accuracy of the information they found,</p> <p>9 that's different.</p> <p>10 What we mean here by "genuine" is that</p> <p>11 we did not create false or misleading</p> <p>12 information. In fact, we found that we had</p> <p>13 informed the client of some false information</p> <p>14 that we discovered.</p> <p>15 Q. Just going back to your answer there.</p> <p>16 So you have a discussion or dialogue with the</p> <p>17 leader of team 1 about the genuineness or quality</p> <p>18 of the information that team 1 has found?</p> <p>19 A. Yes.</p> <p>20 Q. How was that conversation conducted?</p> <p>21 Was it in person?</p> <p>22 A. Yes.</p> <p>23 Q. Ever over the phone?</p> <p>24 A. Never.</p> <p>25 Q. What about via secure text message</p>
<p style="text-align: right;">Page 79</p> <p>1 Vision. I'm not going to be put in that box.</p> <p>2 Q. I understand. What I'm asking you,</p> <p>3 though, is did you and Ms. Wallop ever talk about</p> <p>4 who the leader of team 1 was?</p> <p>5 MR. SCHMIDT: You can answer whether</p> <p>6 you had the conversation.</p> <p>7 A. Yes.</p> <p>8 Q. So she knows the name of the leader of</p> <p>9 team 1?</p> <p>10 A. Yes.</p> <p>11 Q. Okay. Let's go to Eastern 7. It's the</p> <p>12 third page of Waller 2. In the criteria section,</p> <p>13 do you see where it says, "The contractor</p> <p>14 guarantees that all information provided is</p> <p>15 genuine"?</p> <p>16 A. Yes.</p> <p>17 Q. What does that mean?</p> <p>18 A. It means that we're not going to make</p> <p>19 up fake information in order to try to impress or</p> <p>20 satisfy the client. That everything we find is</p> <p>21 legitimately – legitimate facts that were</p> <p>22 legitimately researched.</p> <p>23 Q. How do you know if the research is</p> <p>24 genuine if you're not the one doing it?</p> <p>25 MR. SCHMIDT: Objection.</p>	<p style="text-align: right;">Page 81</p> <p>1 service like Signal?</p> <p>2 A. We don't believe in secure text</p> <p>3 messages, so the answer is no.</p> <p>4 Q. Fair enough.</p> <p>5 So in your mind, Signal is not a secure</p> <p>6 means of communication?</p> <p>7 A. I have no way of knowing, but we don't,</p> <p>8 we don't – we have our own methods of</p> <p>9 communicating, but anything in detail is only</p> <p>10 done in person.</p> <p>11 Q. Do you think a Signal message is more</p> <p>12 secure than other forms of electronic</p> <p>13 communication like just email?</p> <p>14 MR. SCHMIDT: Objection.</p> <p>15 A. Yes, absolutely.</p> <p>16 Q. Because you never emailed with Mr. Guo</p> <p>17 or Lianchao or Yvette Wang concerning this</p> <p>18 matter, have you?</p> <p>19 A. No, it was only by end-to-end</p> <p>20 encryption that doesn't reside on a server.</p> <p>21 Q. Signal does that, is that right? That</p> <p>22 application?</p> <p>23 A. Yeah.</p> <p>24 Q. How do you know the deliverables are</p> <p>25 provided with the best practice and standards of</p>



EASTERN PROFIT CORPORATION LIMITED vs STRATEGIC VISION US, LLC  
J. Michael Waller on 02/08/2019

<p style="text-align: right;">Page 82</p> <p>1 the industry?</p> <p>2 A. I know.</p> <p>3 Q. The contractor is saying that it will</p> <p>4 provide the deliverables based on the best</p> <p>5 practices and standards in the industry, right?</p> <p>6 A. That's right, yes.</p> <p>7 Q. How would Strategic Vision know that?</p> <p>8 A. The first best standard is the security</p> <p>9 part. We exceed those best standards. The</p> <p>10 second part is the actual computer research,</p> <p>11 which we know from the methods that they're</p> <p>12 using, which are state-of-the-art methods.</p> <p>13 Q. Without divulging who you were working</p> <p>14 for or when it was, have you ever done the actual</p> <p>15 research that team 1 was dispatched to do in this</p> <p>16 case?</p> <p>17 A. Not using the same methods.</p> <p>18 Q. Similar methods?</p> <p>19 A. It takes a certain skill set that I</p> <p>20 don't have, but I have been present and</p> <p>21 supervising in person when it was done in other</p> <p>22 cases.</p> <p>23 Q. What skill set is that?</p> <p>24 A. Deep dive research.</p> <p>25 Q. Go ahead.</p>	<p style="text-align: right;">Page 84</p> <p>1 supervising?</p> <p>2 Q. In any event, including in this</p> <p>3 engagement. I know you don't know, right?</p> <p>4 A. Right.</p> <p>5 Q. What about in other engagements?</p> <p>6 MR. SCHMIDT: Objection. That's kind</p> <p>7 of impossible to answer.</p> <p>8 A. On some things you can never know</p> <p>9 everybody on the team. It's not possible, if</p> <p>10 something is outsourced or whatever. Yeah, there</p> <p>11 have been other times where I have – this whole</p> <p>12 profession involves an unusually high degree of</p> <p>13 trust that no – it has to be personal trust, and</p> <p>14 you learn that by trial and error over a number</p> <p>15 of years.</p> <p>16 So you then learn to trust people who</p> <p>17 do the work for you and produce that work.</p> <p>18 Sometimes I have been part of the actual teams,</p> <p>19 but for the sake of protecting the client's</p> <p>20 identity and the existence of the work, we had</p> <p>21 worked through cutouts, and that's been similar</p> <p>22 with other projects.</p> <p>23 Q. Let's go to translation issue on</p> <p>24 Eastern 6. Starting on the bottom of the page,</p> <p>25 it says, "When the contractor encounters</p>
<p style="text-align: right;">Page 83</p> <p>1 A. Just like in a law firm where you have</p> <p>2 the attorney and you have a paralegal. It</p> <p>3 doesn't mean the paralegal is incompetent. It's</p> <p>4 just the person is not an attorney. Or you have</p> <p>5 the partner who might not have passed the bar but</p> <p>6 owns the firm and can run the firm or manage the</p> <p>7 firm, right.</p> <p>8 So you have people with different skill</p> <p>9 sets, but they all know each other and they all</p> <p>10 work together, or they all at least trust each</p> <p>11 other. And so you have certain of them delegate</p> <p>12 the work to others to do.</p> <p>13 Q. How long have you known the leader of</p> <p>14 team 1?</p> <p>15 A. For about four or five years.</p> <p>16 Q. And you've done other work with that</p> <p>17 individual concerning investigatory research?</p> <p>18 A. Yes.</p> <p>19 Q. Did you run into any issues with the</p> <p>20 quality of that work?</p> <p>21 A. Never.</p> <p>22 Q. Have you ever known the members of any</p> <p>23 of the teams that are led by the leader of</p> <p>24 team 1?</p> <p>25 A. The individuals that he was</p>	<p style="text-align: right;">Page 85</p> <p>1 information requiring translation, the contractor</p> <p>2 will provide electronic copies of the material to</p> <p>3 the client for the client to evaluate and</p> <p>4 translate." Do you see that?</p> <p>5 A. Yes.</p> <p>6 Q. How would that work? I take it that</p> <p>7 you don't speak Mandarin?</p> <p>8 A. No.</p> <p>9 Q. Does Ms. Wallop speak Mandarin?</p> <p>10 A. She understands some.</p> <p>11 Q. Can she read it?</p> <p>12 A. I don't know.</p> <p>13 Q. How did this agreement contemplate the</p> <p>14 use of translators?</p> <p>15 A. We had said from the beginning that</p> <p>16 we're going to need to have linguists doing the</p> <p>17 original research.</p> <p>18 Q. The members of team 1?</p> <p>19 A. Yes. And Guo said he didn't want that.</p> <p>20 He would take care of all of the translations.</p> <p>21 We then raised the issue well, these people are</p> <p>22 going to dig up raw material in a language they</p> <p>23 don't speak.</p> <p>24 Q. Right.</p> <p>25 A. How are they going to evaluate what</p>

EASTERN PROFIT CORPORATION LIMITED vs STRATEGIC VISION US, LLC  
J. Michael Waller on 02/08/2019

<p style="text-align: right;">Page 86</p> <p>1 they have? He says, "Just dig up the information 2 and send it to me and let me evaluate it." So we 3 ended up saying we really need to have people who 4 get the language. This was, I believe, through 5 Lianchao, who agreed. So we retained two fluent, 6 say, diplomatic-quality Mandarin language 7 linguists who were not Chinese nationals to be 8 part of that team. 9 Q. What was the concern about them being 10 Chinese nationals? 11 A. In case they were agents of the 12 Communist party. And Guo was pleased with that. 13 Q. So who were the two individuals that 14 you retained to do this translation work? 15 A. They were part of team 1. I don't know 16 their identities. 17 Q. So team 1 did have Mandarin-speaking 18 and Mandarin-reading members? 19 A. Yes. We added them on when we realized 20 we were going to need them. And I believe 21 Lianchao said, "Yeah, go ahead and get them, as 22 long as they're not Chinese nationals, or don't 23 live in China." 24 Q. So were you involved in the vetting 25 process for those individuals, or no?</p>	<p style="text-align: right;">Page 88</p> <p>1 A. Yeah, the Chinese could intercept it. 2 Q. Paper? 3 A. No, paper is just too cumbersome. And 4 you've got the digital forensics within the USB 5 drive so he could gauge what was in there. But 6 you don't want printouts of computer code. You 7 want to be able to exploit that code. You can't 8 do that on paper. 9 Q. So some of the raw data just in terms 10 of feasibility and practicality had to be 11 electronic? 12 A. Yes. 13 Q. In terms of transmitting it? 14 A. Yes, and in delivering it to him. He 15 simply specified no paper and nothing 16 electronically transmitted, so that was fair. 17 That was fine. 18 Q. I want to talk about this irregular 19 circumstances clause. Do you see that on page 20 Eastern 7? 21 A. Yes. 22 Q. Was this concept of irregular 23 circumstances discussed prior to the execution of 24 the agreement? 25 A. Yes.</p>
<p style="text-align: right;">Page 87</p> <p>1 A. No. 2 Q. So did you understand that you weren't 3 really going to be able to read a lot of the data 4 that was part of this research? 5 A. That was explicit. A lot of it is just 6 code. 7 MR. GRENDI: Do we have an issue? 8 THE VIDEOGRAPHER: Move the mic up. 9 MR. GRENDI: That's fine. Just let us 10 know. 11 THE WITNESS: How is it now? Is this 12 good? 13 THE VIDEOGRAPHER: It's just when your 14 hands are there. I want you to be 15 comfortable. 16 THE WITNESS: I'm in the hot seat. 17 Q. Why was it that only USB drives would 18 be used for deliverables? 19 A. Guo specified that. He was insistent 20 on it. 21 Q. Was there any pushback or discussion of 22 using USB drives for transmitting information? 23 A. No, it made sense. He didn't want 24 anything distributed electronically or on paper. 25 Q. Did he explain why?</p>	<p style="text-align: right;">Page 89</p> <p>1 Q. Who came up with that clause or 2 insisted upon it? 3 A. I drafted this section of it. 4 Q. You personally? 5 A. Yes. 6 Q. What were you trying to convey when you 7 drafted this section? 8 A. That there is no even flow of data. 9 That we're going to face challenges as in any 10 research project. Like any legal case, you can't 11 state your case on the first month. You have to 12 build the case over a period of time. And 13 sometimes you're going to run into dead ends. 14 Sometimes you find false information. Sometimes 15 you'll be spoofed by the other side. 16 There are risks of detection, the 17 countermeasures the other side takes. There are 18 legal issues. There are logistical issues given 19 the cumbersome physical nature of delivery of the 20 information by USB drive. So we're just putting 21 this here that we both understand that it's not 22 all going to be a smooth delivery. 23 Q. So does irregular circumstance in your 24 mind encompass items, only items that are out of 25 the control of the contractor or researching</p>



EASTERN PROFIT CORPORATION LIMITED vs STRATEGIC VISION US, LLC  
J. Michael Waller on 02/08/2019

<p style="text-align: right;">Page 90</p> <p>1 party?</p> <p>2 MR. SCHMIDT: Objection.</p> <p>3 Q. Let me ask that again. That's fair</p> <p>4 enough.</p> <p>5 If Strategic Vision makes a mistake or</p> <p>6 fails to do its job for any reason, would that be</p> <p>7 part of irregular circumstances?</p> <p>8 A. What do you mean by "failed to do its</p> <p>9 job"?</p> <p>10 Q. Let me try it this way.</p> <p>11 A. If you get in an accident on the way to</p> <p>12 work, are you failing to go to work?</p> <p>13 MR. SCHMIDT: Let him rephrase it. You</p> <p>14 said you don't understand it. That's all</p> <p>15 you have to do.</p> <p>16 Q. That's fine.</p> <p>17 Does irregular circumstances only</p> <p>18 include, let's just say, outside problems that</p> <p>19 Strategic Vision would encounter?</p> <p>20 MR. SCHMIDT: Objection. But go ahead</p> <p>21 to the extent you can.</p> <p>22 A. Would you define "outside problem"?</p> <p>23 Q. Let's talk about – you described it</p> <p>24 earlier, third parties blocking the research or</p> <p>25 there being dead ends. Is that the full scope of</p>	<p style="text-align: right;">Page 92</p> <p>1 Q. What if irregular circumstances just</p> <p>2 totally prevented Strategic Vision from providing</p> <p>3 any research reports? Would the client still</p> <p>4 have to pay?</p> <p>5 A. That's a hypothetical. There's a</p> <p>6 30-day clause to end the contract.</p> <p>7 Q. It's a hypothetical, and I'm asking you</p> <p>8 to please answer the question.</p> <p>9 What if irregular circumstances just</p> <p>10 completely prevented Strategic Vision from</p> <p>11 delivering any work?</p> <p>12 A. We go to the client and say it's not</p> <p>13 possible to do.</p> <p>14 Q. And so they wouldn't – the contract</p> <p>15 would be over at that point?</p> <p>16 A. We would say, hopefully, we can't do it</p> <p>17 this way. Do you want to change the parameters?</p> <p>18 Remember, there were 4,000 names he had, he</p> <p>19 wanted. So we can't do it on these 15. Let's</p> <p>20 try another group of 15 or it can't be done.</p> <p>21 And we had suggested on one way to do</p> <p>22 something, and he didn't want do it that way even</p> <p>23 though it made sense to do it that way. So you</p> <p>24 try to find a way to get the job done, but if</p> <p>25 ultimately you can't get the job done, then that</p>
<p style="text-align: right;">Page 91</p> <p>1 irregular circumstances that you described</p> <p>2 earlier?</p> <p>3 A. No, but it's indicative of an irregular</p> <p>4 circumstance.</p> <p>5 Q. If irregular circumstances occur, does</p> <p>6 the client still have to pay as though it's</p> <p>7 getting full research?</p> <p>8 A. Yes. It's right there in the contract.</p> <p>9 Q. Where does it say that under irregular</p> <p>10 circumstances, the client still has to pay the</p> <p>11 full price?</p> <p>12 A. It's right there in the price. For</p> <p>13 \$750,000 a month, we're going to be doing the</p> <p>14 following work, understanding that there will be</p> <p>15 irregular circumstances that may prevent certain</p> <p>16 of the work from being done at that point in</p> <p>17 time. This type of work is impossible to predict</p> <p>18 when you're going after people who hide their</p> <p>19 assets, who hide their activity, who operate</p> <p>20 under false names, who have – who use rigorous</p> <p>21 security methods. Or if there's a legal problem</p> <p>22 and we discover hey, it's illegal to do this</p> <p>23 thing that you want us to do, then that's going</p> <p>24 to be a delay. We have to figure out the right</p> <p>25 way to do it.</p>	<p style="text-align: right;">Page 93</p> <p>1 becomes apparent after a lot of back-and-forth</p> <p>2 with the client, just like any job.</p> <p>3 Q. Right, but just to be clear, if</p> <p>4 irregular circumstances prevent the contractor</p> <p>5 from delivering any reports, then does the client</p> <p>6 have to pay anything?</p> <p>7 A. If you don't do the work, why should</p> <p>8 the client pay if you don't do the work, right?</p> <p>9 Q. Right.</p> <p>10 A. But if you do do the work, then the</p> <p>11 client pays, but there are going to be irregular</p> <p>12 circumstances where the product is not going to</p> <p>13 be what you want at a certain time, so we have to</p> <p>14 get around that. Or in the case of starting up,</p> <p>15 it was explicitly understood from the start that</p> <p>16 you're not going to get huge amounts of data</p> <p>17 immediately. You've gotta get the team to</p> <p>18 understand the data first, and you gotta build</p> <p>19 the channels for the data.</p> <p>20 Q. So long as Strategic Vision tries to</p> <p>21 get the data, if irregular circumstances prevent</p> <p>22 them from delivering any reports, that's good</p> <p>23 enough. They should still get paid?</p> <p>24 A. Well, no. Let me give you an example.</p> <p>25 There was around February – between January 26th</p>

EASTERN PROFIT CORPORATION LIMITED vs STRATEGIC VISION US, LLC  
J. Michael Waller on 02/08/2019

<p style="text-align: right;">Page 94</p> <p>1 and February 1st when the client was upset at the 2 way – things weren't moving fast enough for him. 3 We were directed – Yvette directed us in writing 4 to find another way of doing it. 5 So she was saying proceed with your 6 work. Just find another way to do it. That's 7 when we brought in team 2. 8 Q. Okay. 9 A. So that was an irregular circumstance. 10 Really it wasn't a delay on our part because we 11 were consistent with any research standard. We 12 were doing it as rapidly as humanly and 13 mathematically possible. It's just the client 14 objected because he thought it was a long delay. 15 If you recall in this, we prorated 16 things so that the first two weeks were not at 17 his expense. He agreed. So we had only been in 18 the contract effectively ten days, and he's 19 already objecting that we're not producing 20 monthly reports and everything else. 21 Q. We'll get to that. 22 MR. SCHMIDT: Let him finish. 23 Q. Go ahead. 24 A. Because in order to satisfy him and 25 what he wanted, we offered to go ahead with a</p>	<p style="text-align: right;">Page 96</p> <p>1 And when we find that the – as our 2 team 1 discovered and as Lianchao Han confirmed, 3 at least two and as possibly as many as four of 4 the 15 were not real people. 5 Q. You're talking about the fish? 6 A. Yes. 7 Q. But the contract does say that the 8 comprehensive historical reports are 300,000 per 9 report? 10 MR. SCHMIDT: Objection. 11 MR. GRENDI: It says it on that page, 12 Eastern 8. 13 A. Per year. 14 Q. Yeah. And the tracking reports are – 15 A. Look before that, please. "The flat 16 price structure is as follows." So whether it's 17 a small report or a large report, it's a flat 18 rate structure. And that is an annual number, 19 not a weekly or monthly number. 20 Q. So in your mind, the report – strike 21 that. 22 In your mind, the reports are not 23 broken down on a per-report basis cost? 24 A. Correct. 25 Q. So there's no charge in this agreement</p>
<p style="text-align: right;">Page 95</p> <p>1 different team using different methodologies in 2 parallel with team 1, and that's when Yvette 3 instructed us on or about February 1st in a 4 Signal text to go ahead and use the – start up 5 the other method. 6 So we were still doing the work, and we 7 were still finding a way to give him the 8 deliverables even though going with team 2 was 9 beyond what we had promised. So we were doing 10 extra work for him at this time. 11 Q. In this contract is Strategic Vision 12 compensated on a per-report basis? 13 MR. SCHMIDT: Objection. Go ahead. 14 A. It's a flat rate basis. It says "Up to 15 15." It doesn't say 15. It says "Up to 15." 16 Q. Where are you looking, just so I know? 17 A. The top of page 8. "The first month, 18 January, of this contract will include up to 15 19 fish for a total of 30 reports and will decrease 20 to ten fish, etc.," for February, for March and 21 for the duration of the contract. So this was 22 explicit. It's not all going to be complete on 23 the first month. Even digging into certain of 24 the names, we're just not going to have it in the 25 first month.</p>	<p style="text-align: right;">Page 97</p> <p>1 for what a weekly report is? 2 A. That's the whole problem or the whole 3 issue with calling them "fish" and "keeping 4 things up at a water tank level." That was his 5 metaphor for explaining what he wanted at a 6 certain level. We went ahead with that as long 7 as you keep it up at that metaphorical waterline. 8 The actual details of the report are going to 9 vary. That's explicit in here in this contract. 10 We refer to the paragraph right above 11 flat price structure. We refer to each of these 12 as "We will measure each of the 30 reports as, 13 quote, 'report equivalents' in the event that it 14 is necessary to stop work prematurely on one fish 15 and replace it with a second fish. We will then 16 have the partial report on the terminated fish," 17 etc. 18 So it's explicitly understood in this 19 contract that you're gonna be stop and go and 20 things are going to be incomplete, and then you 21 go on to the next one, but we'll still have that 22 same universe of individuals to be collecting 23 data on. 24 Q. Just without identifying what you said 25 or who you said it to, did you consult a lawyer</p>

EASTERN PROFIT CORPORATION LIMITED vs STRATEGIC VISION US, LLC  
J. Michael Waller on 02/08/2019

<p style="text-align: right;">Page 98</p> <p>1 in connection with drafting this agreement?</p> <p>2 A. The question answers itself. No.</p> <p>3 Q. Why does it answer itself?</p> <p>4 A. It's not legalistic at all. It's our</p> <p>5 own wording. It's more of like an MOU between</p> <p>6 parties that was executed as a contract. This is</p> <p>7 the way we all understand this was going to work.</p> <p>8 But it was signed as a contract.</p> <p>9 Q. What does "MOU" stand for?</p> <p>10 A. Memorandum of understanding or</p> <p>11 statement of work, or whatever other word you</p> <p>12 want to use.</p> <p>13 Q. Just going to Eastern 9, the last page</p> <p>14 of this document. Do you see where it says, "It</p> <p>15 is understood that the client may direct other</p> <p>16 entities to pay the contractor and that such</p> <p>17 payments" –</p> <p>18 (Court reporter interruption.)</p> <p>19 Q. – "will be deemed satisfactory</p> <p>20 compensation by the contractor."</p> <p>21 Do you see that?</p> <p>22 A. Yes.</p> <p>23 Q. Why is this clause in the agreement?</p> <p>24 A. To be set up to conceal from the</p> <p>25 Chinese authorities that Guo was funding this</p>	<p style="text-align: right;">Page 100</p> <p>1 A. We never heard of Eastern Profit until</p> <p>2 the day Yvette said it's gonna be Eastern Profit.</p> <p>3 Q. So that was January 6th?</p> <p>4 A. No, that was late December.</p> <p>5 Q. What did you say in response to Yvette</p> <p>6 telling you that Eastern Profit was going to be</p> <p>7 the counterparty to this research agreement?</p> <p>8 A. I was not there for the signing.</p> <p>9 Q. But this was not the signing?</p> <p>10 A. I had not heard of Eastern Profit.</p> <p>11 There were several days in late December when it</p> <p>12 was just Yvette and Ms. Wallop talking.</p> <p>13 Q. I see. So you talked to Ms. Wallop</p> <p>14 about how Eastern Profit got on the agreement?</p> <p>15 A. Yes.</p> <p>16 Q. But you don't know why yourself?</p> <p>17 A. No. I would presume it's for the</p> <p>18 reasons stated in the subsequent payments</p> <p>19 portion, but I don't know that. Because Eastern</p> <p>20 Profit never paid us anything, and we never</p> <p>21 received any money from any Guo entity after</p> <p>22 execution of the contract.</p> <p>23 Q. It says here that "All client payments</p> <p>24 must be received by the contractor by wire</p> <p>25 transfer within five business days of invoice."</p>
<p style="text-align: right;">Page 99</p> <p>1 research. So it was explicit that nothing from</p> <p>2 any of his Hong Kong accounts straight to his</p> <p>3 Strategic Vision account, but rather through a</p> <p>4 circuitous route of various places in various</p> <p>5 countries and various cutouts to conceal these</p> <p>6 transfers from the Chinese intelligence service.</p> <p>7 Q. So it was understood that the client</p> <p>8 would not directly pay the contractor because of</p> <p>9 these security concerns?</p> <p>10 A. Right. Well, the client would – if</p> <p>11 you think of it as a collaborative versus a legal</p> <p>12 means, the client authorizes the payment to be</p> <p>13 paid, or it instructs that the payment be paid,</p> <p>14 and then it's done through a circuitous route.</p> <p>15 So we understand that the funds have come on</p> <p>16 Guo's instruction. And then we let him know that</p> <p>17 the funds have been received. There were no</p> <p>18 funds that were sent to Strategic Vision after</p> <p>19 the execution of this contract.</p> <p>20 Q. Let me ask you this. Do you know why</p> <p>21 Eastern Profit is the client?</p> <p>22 A. No, we don't know why it's the client.</p> <p>23 Q. Well, how did it get into the contract?</p> <p>24 A. How did what get in?</p> <p>25 Q. Eastern Profit.</p>	<p style="text-align: right;">Page 101</p> <p>1 A. Right.</p> <p>2 Q. Do you know if Strategic Vision ever</p> <p>3 sent any invoices to Eastern Profit?</p> <p>4 A. It was a verbal invoice. There were</p> <p>5 not to be written invoices.</p> <p>6 Q. Have you done verbal invoicing before?</p> <p>7 A. Yes.</p> <p>8 Q. It's a new one for me. Can you just</p> <p>9 describe how that works?</p> <p>10 A. If you want to keep something</p> <p>11 untraceable, you don't leave a paper trail. If</p> <p>12 you don't leave a paper trail, you don't submit</p> <p>13 invoices for those purposes, especially if the</p> <p>14 purpose is to protect the client's identity from</p> <p>15 one of the most notorious spy agencies in the</p> <p>16 world who is out to get your client. So you just</p> <p>17 say, "Okay, it's the end of the pay date," and</p> <p>18 then they will send the next one.</p> <p>19 You're kind of smirking at that.</p> <p>20 Q. No, it's a new thing for me.</p> <p>21 A. It's normal in our area of work.</p> <p>22 Q. That's fine.</p> <p>23 A. As long as we comply with the IRS and</p> <p>24 report our income, then that's fine. We've done</p> <p>25 work in other ways to protect our clients and</p>

EASTERN PROFIT CORPORATION LIMITED vs STRATEGIC VISION US, LLC  
J. Michael Waller on 02/08/2019

<p style="text-align: right;">Page 102</p> <p>1 it's not in writing.</p> <p>2 Q. Sure. Do you know if a verbal invoice</p> <p>3 was issued in this case?</p> <p>4 A. Yes.</p> <p>5 Q. When was that?</p> <p>6 A. On or about February 16th.</p> <p>7 Q. That would have been the first?</p> <p>8 A. 15th or 16th. Yes. It was supposed to</p> <p>9 be on or about January 31st, but we had agreed on</p> <p>10 the 26th. I had offered, with Ms. Wallop's</p> <p>11 concurrence, to write off the first two weeks of</p> <p>12 work to satisfy Guo, because he was so agitated.</p> <p>13 We wanted to keep the contract with him. So we</p> <p>14 would not have invoiced until – we normally</p> <p>15 would have on January 31st, but we did not until</p> <p>16 roughly February 15th.</p> <p>17 And that was to Lianchao Han because by</p> <p>18 that time, Yvette had instructed us not to</p> <p>19 communicate with her anymore, or that Guo had</p> <p>20 said not to communicate with her anymore.</p> <p>21 Q. Was it you or Ms. Wallop who, I guess,</p> <p>22 called Lianchao to verbally invoice?</p> <p>23 A. We would only speak in person.</p> <p>24 Q. So were you there when the verbal</p> <p>25 invoice was issued?</p>	<p style="text-align: right;">Page 104</p> <p>1 we were talking to Guo as far as we were</p> <p>2 concerned.</p> <p>3 Q. Do you know if Lianchao works for</p> <p>4 Eastern Profit?</p> <p>5 A. No.</p> <p>6 Q. Do you know one way or another whether</p> <p>7 he does or does not or you just don't know?</p> <p>8 A. He told me Guo has offered to pay him</p> <p>9 many times, and he was only doing it as a</p> <p>10 volunteer because he had larger interests in</p> <p>11 promoting the Chinese democracy movement.</p> <p>12 Q. Because of his own political feelings</p> <p>13 and history?</p> <p>14 A. Yeah. He said Guo was very mercurial,</p> <p>15 doesn't keep his word and rips off his law firms</p> <p>16 and clients and customers and fellow investors,</p> <p>17 and so we should be – we should be sure to have</p> <p>18 our money in hand before we continue to work.</p> <p>19 Q. When did he tell you that?</p> <p>20 A. In December and in January and in</p> <p>21 February.</p> <p>22 Q. Was that an in-person meeting?</p> <p>23 A. In person. And the public record shows</p> <p>24 that Guo rips off a lot of people.</p> <p>25 Q. That is your perception of it?</p>
<p style="text-align: right;">Page 103</p> <p>1 A. Yeah. It was more like – verbal</p> <p>2 invoice, in quotes, is, "Hey, Lianchao, it's time</p> <p>3 to pay the first month's 750,000."</p> <p>4 Q. Now, did he say anything in response to</p> <p>5 that?</p> <p>6 A. He said "Guo's really upset right now.</p> <p>7 Let me work with him on it." But there was never</p> <p>8 any indication of termination.</p> <p>9 Q. Were any other verbal invoices issued?</p> <p>10 A. Well, no, because a week later we got</p> <p>11 served.</p> <p>12 Q. So the answer is no?</p> <p>13 A. No, because a week later we got served.</p> <p>14 Q. You're saying if you hadn't been</p> <p>15 served, you would have issued the invoice for the</p> <p>16 next month?</p> <p>17 A. We would have still been working with</p> <p>18 Lianchao had we been paid. This is to have been</p> <p>19 paid within five days; that would have been</p> <p>20 February 20th. We would have stopped work by</p> <p>21 then because we did not get paid. But we did not</p> <p>22 stop work because Lianchao said he was trying to</p> <p>23 work it out.</p> <p>24 Q. I see.</p> <p>25 A. He's speaking as the agent of Guo, so</p>	<p style="text-align: right;">Page 105</p> <p>1 A. No, that's the news reports of it.</p> <p>2 Q. How did that come up? Did Lianchao</p> <p>3 raise that issue or did you ask him about that?</p> <p>4 A. I don't remember.</p> <p>5 MR. GRENDI: Why don't we go off the</p> <p>6 record.</p> <p>7 THE VIDEOGRAPHER: Off the record at</p> <p>8 12:14.</p> <p>9 (Whereupon, a short recess was taken.)</p> <p>10 THE VIDEOGRAPHER: Back on the record</p> <p>11 at 12:20.</p> <p>12 MR. GRENDI: This is Waller 3.</p> <p>13 (Waller Exhibit 3, Handwritten document</p> <p>14 Bates stamped Eastern 11, marked for</p> <p>15 identification.)</p> <p>16 Q. Mr. Waller, do you recognize this</p> <p>17 document?</p> <p>18 A. No.</p> <p>19 Q. You've never seen it before?</p> <p>20 A. No.</p> <p>21 Q. Do you recognize the handwriting on the</p> <p>22 document?</p> <p>23 A. It appears to be French Wallop's</p> <p>24 handwriting.</p> <p>25 Q. Do you know her handwriting pretty good</p>

EASTERN PROFIT CORPORATION LIMITED vs STRATEGIC VISION US, LLC  
J. Michael Waller on 02/08/2019

<p style="text-align: right;">Page 106</p> <p>1 or well?</p> <p>2 A. Enough to tell that it appears to be</p> <p>3 hers.</p> <p>4 Q. Do you recognize any of these names?</p> <p>5 A. They're mostly Arabic names.</p> <p>6 Q. Do you know if any of the individuals</p> <p>7 on this list of names are clients of</p> <p>8 Strategic Vision?</p> <p>9 A. No, I don't know.</p> <p>10 Q. So you've never provided services for</p> <p>11 any of the individuals listed on this document?</p> <p>12 MR. SCHMIDT: Him being personally?</p> <p>13 MR. GRENDI: Yes.</p> <p>14 A. No.</p> <p>15 Q. Okay. Did you ever talk to Mr. Guo or</p> <p>16 Lianchao or Yvette Wang about people who are</p> <p>17 clients of Strategic Vision?</p> <p>18 A. Present clients or past clients or</p> <p>19 prospective clients?</p> <p>20 Q. Either.</p> <p>21 A. No. Okay. Repeat the question, then.</p> <p>22 Q. Sure. Did you ever talk to Mr. Guo,</p> <p>23 Lianchao or Yvette Wang about people who are</p> <p>24 clients of Strategic Vision?</p> <p>25 A. No.</p>	<p style="text-align: right;">Page 108</p> <p>1 not an entirely accurate spelling for the next</p> <p>2 one. I believe it's K-o-d-o-r-k-h-o-v-s-k-y. It</p> <p>3 might be K-h in the beginning, but I think it's</p> <p>4 K. It's K, yeah.</p> <p>5 Q. It's for the ease of my own butchering</p> <p>6 of the Russian language, who is that individual?</p> <p>7 I'll call him Mr. K?</p> <p>8 A. He is a Russian dissident. He's exiled</p> <p>9 in London.</p> <p>10 Q. You and Strategic Vision have provided</p> <p>11 investigatory services for that individual?</p> <p>12 A. Messaging services.</p> <p>13 Q. Message services?</p> <p>14 A. Yes.</p> <p>15 Q. But not investigation research?</p> <p>16 A. I didn't. I don't know if Strategic</p> <p>17 Vision did.</p> <p>18 Q. Okay. You said before there was</p> <p>19 another client that was described to Lianchao,</p> <p>20 Mr. Guo or Yvette Wang.</p> <p>21 Do you recall that?</p> <p>22 A. I'm not sure.</p> <p>23 Q. Without divulging the name of that</p> <p>24 client, what kind of client was it?</p> <p>25 A. I don't know if it was a client in fact</p>
<p style="text-align: right;">Page 107</p> <p>1 Q. You never told any of those three</p> <p>2 people, We've done work for X, Y or Z?</p> <p>3 A. Yeah, that's why I asked what you mean</p> <p>4 by "clients," whether it's present, past, or</p> <p>5 prospective.</p> <p>6 Q. Let's go with present or past.</p> <p>7 A. No, I wouldn't know Strategic Vision's</p> <p>8 previous clients.</p> <p>9 Q. But you did provide work for – you</p> <p>10 described before two clients of Strategic Vision?</p> <p>11 A. Yes, but none of them are on this list.</p> <p>12 Q. Right, but let me ask you this. Did</p> <p>13 you ever tell Mr. Guo, Yvette Wang or Lianchao</p> <p>14 that you provided work for those two –</p> <p>15 A. Yes.</p> <p>16 Q. – entities. You did.</p> <p>17 And did you describe the names of those</p> <p>18 entities to –</p> <p>19 A. At least one of them. I don't recall</p> <p>20 the exact.</p> <p>21 Q. Which name is that?</p> <p>22 A. Mikhail Khodorkovsky.</p> <p>23 Q. Why don't we help the court reporter</p> <p>24 out with that one?</p> <p>25 A. M-i-k-h-a-i-l. Forgive me if this is</p>	<p style="text-align: right;">Page 109</p> <p>1 or just somebody that Strategic Vision had worked</p> <p>2 with before, so I don't know. I'm not going to</p> <p>3 state as a fact that it was a client, so I don't</p> <p>4 know.</p> <p>5 Q. So that was before the contract was</p> <p>6 signed, those discussions?</p> <p>7 A. I don't recall.</p> <p>8 Q. Did you ever tell Mr. Guo or Lianchao</p> <p>9 that you were helping Russian opposition groups?</p> <p>10 A. Yes.</p> <p>11 Q. When was that?</p> <p>12 A. When was I helping them?</p> <p>13 Q. No. When did you tell them that you</p> <p>14 were helping Russian opposition groups?</p> <p>15 A. Certainly before the contract and maybe</p> <p>16 after the contract.</p> <p>17 Q. What did you tell them about that kind</p> <p>18 of work that you were doing for Russian</p> <p>19 opposition groups?</p> <p>20 A. Starting in – it was – how much</p> <p>21 detail do you want?</p> <p>22 Q. You don't have to go crazy. Just</p> <p>23 generally.</p> <p>24 A. Starting in the late 1980s working with</p> <p>25 anti-Soviet internal movements to help Ukraine,</p>

**EASTERN PROFIT CORPORATION LIMITED vs STRATEGIC VISION US, LLC**  
**J. Michael Waller on 02/08/2019**

<p style="text-align: right;">Page 110</p> <p>1 Latvia, Lithuania, and Estonia secede from the</p> <p>2 USSR. And then with Russian internal opposition</p> <p>3 groups opposed to the Russian – the Soviet</p> <p>4 Communist Party. So they were tied –</p> <p>5 MR. SCHMIDT: Slow down.</p> <p>6 A. Tied to Boris Yeltsin from, like,</p> <p>7 roughly '87, '88 up to '93, '94.</p> <p>8 Q. What about more recent work with</p> <p>9 opposition groups and Putin regime?</p> <p>10 A. With Mikhail Khodorkovsky, who is one</p> <p>11 of the lead opposition people against Putin.</p> <p>12 Q. So you told Mr. Guo about the services</p> <p>13 that you provided to Mikhail Khodorkovsky?</p> <p>14 A. Not so much the services as opposed to</p> <p>15 ideas, because one of our ideas was to unite</p> <p>16 Chinese internal opposition with Russian</p> <p>17 opposition and help bring – this was on the</p> <p>18 messaging part of the ideas, the brainstorming</p> <p>19 with Guo. We brainstormed a lot in December and</p> <p>20 had wide-ranging discussions. So in this case,</p> <p>21 it was to work with Russian internal opposition</p> <p>22 groups to bring things in and out of China over</p> <p>23 the land border between Russia and China.</p> <p>24 Q. Did you tell them that you had</p> <p>25 connections with the Abu Dhabi princess?</p>	<p style="text-align: right;">Page 112</p> <p>1 A. Not while I was there.</p> <p>2 Q. Did you ever tout connections to the</p> <p>3 White House prior to the execution of the</p> <p>4 contract?</p> <p>5 A. What do you mean by "tout"?</p> <p>6 Q. Like – I won't say advertise, but just</p> <p>7 explain in terms of the quality of your services</p> <p>8 or Strategic Vision's services that you're</p> <p>9 connected to the White House?</p> <p>10 A. Not so much in the services itself.</p> <p>11 It's that I know people in the White House.</p> <p>12 Q. And you told Mr. Guo?</p> <p>13 A. Yes.</p> <p>14 Q. Did you tell them that you worked for</p> <p>15 the Trump presidential campaign?</p> <p>16 A. No, I did not. I did not work for the</p> <p>17 campaign, and I didn't tell them I did.</p> <p>18 Q. Did Ms. Wallop?</p> <p>19 A. Not that I know of. I would say I</p> <p>20 don't know.</p> <p>21 Q. That's fine.</p> <p>22 Did you tell Mr. Guo, Ms. Wang or</p> <p>23 Lianchao that you worked with the CIA and</p> <p>24 continue to work with the CIA in the Middle East?</p> <p>25 A. No. I had helped the CIA in the past,</p>
<p style="text-align: right;">Page 111</p> <p>1 A. I didn't.</p> <p>2 Q. Did Ms. Wallop?</p> <p>3 A. Probably.</p> <p>4 Q. What about connections in Saudi Arabia?</p> <p>5 Did you tout that as one of the resources that</p> <p>6 you had?</p> <p>7 A. She has Saudi connections.</p> <p>8 Q. What about connections in Qatar,</p> <p>9 Turkey, Iran? Is that all Ms. Wallop?</p> <p>10 A. She has those connections.</p> <p>11 Q. So your connections are with the</p> <p>12 Russian opposition groups?</p> <p>13 A. She has connections with them also and</p> <p>14 with Khodorkovsky.</p> <p>15 Q. So you both provide services to these</p> <p>16 Russian opposition groups?</p> <p>17 A. Yes.</p> <p>18 Q. Did you ever tell Mr. Guo that you had</p> <p>19 20 or so projects going at a given time, research</p> <p>20 projects?</p> <p>21 A. At the same time?</p> <p>22 Q. Yes.</p> <p>23 A. No.</p> <p>24 Q. Did Ms. Wallop while you were there</p> <p>25 tell –</p>	<p style="text-align: right;">Page 113</p> <p>1 but I never said I still work with them.</p> <p>2 Q. Do you still work with them?</p> <p>3 A. No.</p> <p>4 MR. GRENDI: Let's go to Waller 4.</p> <p>5 (Waller Exhibit 4, Document Bates</p> <p>6 stamped, marked for identification.)</p> <p>7 Q. Do you recognize this document?</p> <p>8 I gave you the one with my marks on it.</p> <p>9 Would you mind switching that?</p> <p>10 A. Sure. I should take a look at your</p> <p>11 marks.</p> <p>12 Q. That's okay. There's nothing that good</p> <p>13 there.</p> <p>14 A. It looks like my LinkedIn page, but I</p> <p>15 don't see an indication that it's on LinkedIn.</p> <p>16 Q. Is this your background information?</p> <p>17 A. It appears to be.</p> <p>18 Q. Do you remember giving this information</p> <p>19 to Mr. Guo?</p> <p>20 A. No.</p> <p>21 Q. Or Lianchao?</p> <p>22 A. Maybe Lianchao.</p> <p>23 Q. That would have been before this</p> <p>24 contract was signed?</p> <p>25 A. Yes.</p>



**EASTERN PROFIT CORPORATION LIMITED vs STRATEGIC VISION US, LLC**  
**J. Michael Waller on 02/08/2019**

<p style="text-align: right;">Page 114</p> <p>1 Q. What does Georgetown Research do?</p> <p>2 A. It's an LLC that I set up with</p> <p>3 French Wallop in the fall of 2017 to do joint</p> <p>4 work, and then it became a vehicle for executing</p> <p>5 this contract.</p> <p>6 Q. So Georgetown Research does</p> <p>7 investigatory work?</p> <p>8 A. Yes.</p> <p>9 Q. That's in Washington, D.C., right?</p> <p>10 A. Yes.</p> <p>11 Q. Do you have an office or is that based</p> <p>12 out of your home?</p> <p>13 A. No, it's just an LLC.</p> <p>14 Q. So there's no –</p> <p>15 A. No staff, no office, no physical</p> <p>16 address.</p> <p>17 Q. And it's just you?</p> <p>18 A. Yes. Pardon, it's French Wallop and me</p> <p>19 for this LLC.</p> <p>20 MR. SCHMIDT: For Georgetown.</p> <p>21 A. For Georgetown Research.</p> <p>22 Q. So you're both members of that LLC?</p> <p>23 A. Yes.</p> <p>24 Q. Got it. Just in your bio it says that</p> <p>25 you did special projects at Blackwater from 2007</p>	<p style="text-align: right;">Page 116</p> <p>1 Q. But you don't do that work anymore</p> <p>2 through the American Foreign Policy Council?</p> <p>3 A. No.</p> <p>4 Q. I guess you're not with that outfit</p> <p>5 anymore?</p> <p>6 A. Correct.</p> <p>7 MR. GRENDI: Let's do 5.</p> <p>8 (Waller Exhibit 5, Signal text message</p> <p>9 thread, marked for identification.)</p> <p>10 Q. Mr. Waller, do you recognize this</p> <p>11 Signal thread?</p> <p>12 A. Let me take a look. Yes.</p> <p>13 Q. Who is this correspondence between?</p> <p>14 A. Between Lianchao Han and myself.</p> <p>15 Q. I know you mentioned before, but how</p> <p>16 long do you know Lianchao Han?</p> <p>17 A. I first met him in the '80s, but I've</p> <p>18 then lost contact with him. I've known him for</p> <p>19 over 30 years but haven't worked with him closely</p> <p>20 until this project.</p> <p>21 Q. How did you get in touch with him in</p> <p>22 connection with this project?</p> <p>23 A. Through French Wallop.</p> <p>24 Q. So French Wallop reintroduced you to</p> <p>25 Lianchao Han?</p>
<p style="text-align: right;">Page 115</p> <p>1 to 2009?</p> <p>2 A. Yes.</p> <p>3 Q. Is that company now known as – I think</p> <p>4 it's Academi?</p> <p>5 A. Academi. A-c-a-d-e-m-i. I don't know</p> <p>6 if it's still by that name or not, but it became</p> <p>7 that name.</p> <p>8 Q. Is this the Blackwater that used to be</p> <p>9 run by a fellow named Erik Prince?</p> <p>10 THE WITNESS: Is this relevant?</p> <p>11 A. Yes.</p> <p>12 Q. You worked at Blackwater with</p> <p>13 Erik Prince?</p> <p>14 A. Yes.</p> <p>15 Q. Did you mention that experience with</p> <p>16 Blackwater prior to the execution of the contract</p> <p>17 to Mr. Guo?</p> <p>18 A. I don't know. I don't remember.</p> <p>19 Q. Just below that it says "Vice President</p> <p>20 and American Foreign Policy Council"?</p> <p>21 A. Yeah.</p> <p>22 Q. Is this the work you were previously</p> <p>23 describing concerning working with Russian</p> <p>24 opposition groups?</p> <p>25 A. Yes. It's part of it, yes.</p>	<p style="text-align: right;">Page 117</p> <p>1 A. As I, as I understand it from her,</p> <p>2 Bill Gertz was working with Lianchao Han and Guo,</p> <p>3 and then Guo said he wanted to do this project</p> <p>4 that we're discussing now. Bill Gertz</p> <p>5 contacted – Bill Gertz is an intelligence and</p> <p>6 defense reporter, and I've known him for 35</p> <p>7 years. So he talked to French about doing it.</p> <p>8 She suggested bringing me in, and then through</p> <p>9 that, I met Lianchao, re-met Lianchao.</p> <p>10 Q. So you weren't part of the – let's</p> <p>11 call it – initial introduction of Bill Gertz and</p> <p>12 Lianchao Han and Mr. Guo?</p> <p>13 A. No.</p> <p>14 Q. Does Lianchao Han have a relationship</p> <p>15 with Strategic Vision? Let's call it a financial</p> <p>16 relationship.</p> <p>17 A. No, not that I know of.</p> <p>18 Q. Does he have a financial relationship</p> <p>19 with you or any of your LLCs?</p> <p>20 A. No.</p> <p>21 Q. So he doesn't get any referral fees for</p> <p>22 bringing work to you –</p> <p>23 A. No.</p> <p>24 Q. – or Strategic Vision?</p> <p>25 A. No.</p>

EASTERN PROFIT CORPORATION LIMITED vs STRATEGIC VISION US, LLC  
J. Michael Waller on 02/08/2019

<p style="text-align: right;">Page 118</p> <p>1 Q. And I'll just be super clear, and 2 excuse the lawyer for being a little redundant. 3 Did Lianchao Han receive any 4 compensation for bringing Eastern Profit or 5 Mr. Guo to Strategic Vision? 6 A. No. 7 Q. I'll ask the same question for you or 8 your LLCs. Did you ever pay Lianchao Han for 9 introducing you to Mr. Guo or Eastern Profit? 10 A. No. 11 Q. Let's turn to – this is SVUS62, the 12 second page there. Between the two text bubbles, 13 there's a lighter one and a darker one. Which 14 one is you and which one is Lianchao Han? 15 A. I'm the darker one. 16 Q. And Lianchao Han is the lighter one? 17 A. Yes. 18 Q. Looking at this page, who is the friend 19 you could provide the menu for on December 18th? 20 A. Guo. 21 Q. That's Mr. Guo? 22 A. Yes. 23 Q. I'm turning to the next page. This is 24 your message about Trump giving an excellent 25 speech today?</p>	<p style="text-align: right;">Page 120</p> <p>1 A. He did. Yeah, he did introduce me to 2 him. 3 Q. But you didn't end up doing business 4 with him? 5 A. No. 6 Q. Turning to 64. Do you see where it 7 says "New York friend wants to do it but asks for 8 more insurance"? 9 A. Yes. 10 Q. Who did you understand the New York 11 friend to be there? 12 A. Guo. 13 Q. What do you think Mr. Han meant by 14 "more insurance"? 15 A. I think he meant assurance. Assurances 16 that the job could be done. 17 Q. I see. So it's kind of just a phonetic 18 mistake in terms of the text message? 19 A. Or whatever, yeah. 20 Q. On the next page, do you see where you 21 wrote, "I don't think the New York guy is 22 serious"? 23 A. Yes. 24 Q. What did you mean by that? 25 A. Guo kept waffling on what he wanted,</p>
<p style="text-align: right;">Page 119</p> <p>1 A. Yes. 2 Q. And the response is "Yes, SB talked 3 about it here." Do you see that? 4 A. Yes. 5 Q. Who is SB? 6 A. I would presume it's Steve Bannon. 7 Q. In the next message, Lianchao Han asks 8 you about "our friend from Tokyo." 9 Do you see that? 10 A. Yes. 11 Q. Who's your friend from Tokyo? 12 A. He's not referring to my friend. He's 13 referring to "our" as a generic "our." It was a 14 Chinese individual from Tokyo whose name, whose 15 real name I never knew. 16 Q. So not Mr. Guo? 17 A. No. 18 Q. This is some other individual? 19 A. Some other person. 20 Q. So does Lianchao Han introduce you to 21 other potential clients for the services that you 22 provide? 23 A. No. 24 Q. So he didn't ever introduce you to this 25 other Chinese individual?</p>	<p style="text-align: right;">Page 121</p> <p>1 and he was saying things that seemed conflicted. 2 Q. What do you mean by that? 3 A. He was waffling back and forth on 4 price, on scope, on what he wanted. He wanted to 5 buy two Rockefeller properties, plus a \$25 6 million house in Washington, D.C., and a building 7 across the street from the U.S. Treasury 8 Department with a line of view sight to the 9 White House, and set up all this research at the 10 same time. It looked like he didn't seem serious 11 to me because he – he seemed like he was a big 12 thinker, but it wasn't going to be. 13 Q. So you didn't think that he was really 14 going to follow through with doing any of the 15 work that you guys were discussing at the time? 16 A. I was apprehensive that he was going to 17 do any work with us. Oh, and because the prices 18 that he was expecting to pay were nowhere near 19 what things were really going to cost. That's 20 the next line. 21 Q. Let me get there myself, if you don't 22 mind. Lianchao Han's response was, "He wants do 23 it but wants to do it as cheap as possible." 24 Do you see that? 25 A. Right.</p>



EASTERN PROFIT CORPORATION LIMITED vs STRATEGIC VISION US, LLC  
J. Michael Waller on 02/08/2019

<p style="text-align: right;">Page 122</p> <p>1 Q. What do you recall about him wanting to 2 do it for as cheap as possible? 3 A. Well, you can't blame a businessman for 4 wanting to do something as cheap as possible. 5 Q. Do you remember prices being discussed? 6 A. Yeah, prices were discussed, and for 7 the scope that he wanted, it was just simply not 8 possible to do. 9 Q. What did he propose? 10 A. I don't recall precisely what it was. 11 Q. But it was certainly less than whatever 12 ended up being in the contract? 13 A. Right. 14 Q. You wrote, "He will fail if he does it 15 on the cheap." Do you see that? 16 A. Yes. 17 Q. Why did you think it would fail if it 18 was done on the cheap? 19 A. You don't get the top-quality industry 20 standard people. 21 Q. So in other words, you didn't think 22 that you would be able to hire a team that would 23 be of the sufficient quality to do the research 24 that was being asked for? 25 A. No, not with the level of</p>	<p style="text-align: right;">Page 124</p> <p>1 A. I know Bannon. 2 Q. What work were you discussing in this 3 thread about Steve Bannon, other than he made a 4 speech? 5 A. Steve has a lot of ideas to do a whole 6 lot of things, and one of them was to confront 7 the threat that China poses against the 8 United States. 9 Q. Did you have a dialogue with 10 Steve Bannon about the research contemplated by 11 this agreement? 12 A. No. 13 Q. So you never spoke to Steve Bannon 14 about Mr. Guo or Eastern Profit? 15 A. No, or anything China related, except 16 maybe the military problem as a policy matter, 17 but nothing to do with Guo or Lianchao. 18 Q. Turning to the next page. Do you see 19 where you wrote, "I trust your judgment. I'm not 20 anxious to dialogue with him further"? 21 A. Yes. 22 Q. Who were you talking about there? 23 A. About Guo. 24 Q. Why weren't you anxious to keep talking 25 to him?</p>
<p style="text-align: right;">Page 123</p> <p>1 professionalism and security experience, 2 certainly not. 3 Q. You don't have any recollection as to 4 what price he had wanted at that time, or asked 5 for at that time? 6 A. If I remember correctly, he didn't say 7 the price he wanted. He wanted us to give him a 8 price and then he kept saying no. 9 Q. I see. So you had offered some prices 10 and he just said absolutely not? 11 A. Right. That's part of the haggling. I 12 don't recall him giving a price that he was 13 willing to pay, but we settled on the price 14 that's in the contract and adjusted the scope 15 accordingly. 16 Q. In the same text bubble you wrote, 17 "Let's focus on the other guy." 18 Who's the "other guy"? 19 A. I am not sure who it was. 20 Q. Is it the same Chinese individual from 21 Tokyo that was discussed earlier in the thread? 22 A. I don't know. It could have been 23 Bannon. I honestly don't know. 24 Q. You and Lianchao were talking about 25 doing work for Steve Bannon at that time?</p>	<p style="text-align: right;">Page 125</p> <p>1 A. Because he kept coming back with 2 different things that he wanted do which didn't 3 tie into one another, and he didn't seem serious. 4 Q. Do you have experience with people who 5 ask for your services, but that ultimately you 6 think are really not serious about it? 7 A. Yeah. When you're trying to have an 8 serious discussion and he brings out his jacket 9 after jacket of expensive baby alligator skin 10 jackets that were soaked in milk and tailored in 11 Ferrari colors, you think what are we doing here? 12 Q. When did that occur? 13 A. Sometime at his home in December. 14 Q. So you went to a meeting to talk about 15 this contract in December? 16 A. Yes. 17 Q. And he instead was showing you clothes? 18 A. Clothes. This part was made in Italy 19 and this part in Hong Kong, and a Lego set of the 20 Tower Bridge in London and all kinds of stuff 21 that had nothing to do with anything, and then he 22 was being difficult on the things that we wanted 23 to talk about. So I said, "I'm not anxious to 24 dialogue with him further." 25 Q. I got it.</p>

EASTERN PROFIT CORPORATION LIMITED vs STRATEGIC VISION US, LLC  
J. Michael Waller on 02/08/2019

<p style="text-align: right;">Page 126</p> <p>1 Do you see this message from Lianchao 2 Han on December 24, 2017 starting with "I talked 3 with him?" 4 A. Um-hum. 5 Q. What did you understand Lianchao Han to 6 be conveying in this message? 7 A. Let me read the context. So your 8 question? 9 Q. Let me ask it this way. The message 10 from Lianchao says, "If you fail to provide the 11 deliverables as defined in the scope, you should 12 return the deposit. What do you think?" 13 A. Right. 14 Q. What did you understand that to mean? 15 A. I spelled it out in the next, in my 16 response. So we're dialoguing here. We're not 17 defining things. So my response explains – my 18 response would answer your question, my written 19 response here. 20 Q. Just looking at your response here, you 21 wrote, "That probably won't be possible in the 22 first 30 days because of the start-up work. I 23 suggest a minimum of 90 days." Do you see that? 24 A. Yes. 25 Q. Did you put anything in the contract</p>	<p style="text-align: right;">Page 128</p> <p>1 away. I said it's not possible. 2 Q. That's what you're saying in here? 3 When did you tell him it wasn't possible? 4 A. The whole time. And Lianchao agreed 5 with it. And he would have private meetings in 6 Mandarin with Guo about this. 7 Q. So you were – just so we're clear, you 8 were communicating with Mr. Guo through Lianchao? 9 A. Yes. Lianchao was explicitly acting as 10 Guo's agent in this correspondence. 11 Q. And did you ever speak at least via 12 Signal message or other electronic means with 13 Mr. Guo? 14 A. No. Pardon me. Not that I recall. I 15 don't believe I did, but there might have been in 16 the initial stages. I would have destroyed that 17 data. 18 Q. Okay. Below that it says, "I don't 19 know who will sign." Do you see that? 20 A. Yes. 21 Q. Do you know what Lianchao was talking 22 about there? 23 A. Who would sign the contract. 24 Q. Why was that a question? 25 A. It would have been a security question,</p>
<p style="text-align: right;">Page 127</p> <p>1 that memorialized that it wouldn't be possible to 2 do any deliverables in the first 90 days? 3 A. It's addressed in the contract, yes. 4 Q. Where is that? 5 A. Well, let's look. I'm saying the 6 concerns are addressed in the contract. It has 7 the – it is understood that some of the reports 8 were produced on a regular schedule, meaning some 9 were not. They'll be irregular. There will 10 be – then it's followed by the irregular 11 circumstances clause that we discussed. 12 And then there is the 90-day period 13 concerning the comprehensive reports which we 14 already discussed, the progress reports, then the 15 weekly reports, and then the 90-day reports. So 16 we're setting up the – this is the discussion 17 toward what ended up in the contract. 18 Q. At this point, though, you were talking 19 about whether the deliverables meet the scope, 20 right? 21 A. Yes. 22 Q. What deliverables do you think would 23 meet the scope? In other words, what's an 24 acceptable deliverable? 25 A. He had asked for lots of data right</p>	<p style="text-align: right;">Page 129</p> <p>1 meaning Guo would have a surrogate who we would 2 understand was signing on his behalf. 3 Q. Did Strategic Vision think about having 4 a surrogate sign on its behalf for security 5 reasons? 6 A. You have to ask Strategic Vision. I 7 can't answer that. 8 Q. You didn't talk to Ms. Wallop about 9 that? 10 A. No. She was going to sign it because 11 it was her company. 12 Q. Below that it says, "He proposed you 13 and asked us if that would be acceptable to us. 14 All of us agreed, let's keep the agreement." 15 Do you see that? 16 A. Yes. Okay, this refreshes my memory. 17 There was a back-and-forth between whether 18 Lianchao or Yvette would be the signer. 19 Q. And that was on or about December 24th? 20 A. Yes, and just prior to it. 21 Q. So there was a meeting before that? 22 A. There was a back-and-forth with 23 Lianchao this whole time. It just wasn't all in 24 writing. 25 Q. Do you mean on the phone or in person?</p>

EASTERN PROFIT CORPORATION LIMITED vs STRATEGIC VISION US, LLC  
J. Michael Waller on 02/08/2019

<p style="text-align: right;">Page 130</p> <p>1 A. Never on the phone, always in person.</p> <p>2 Q. So regarding this agreement, you never</p> <p>3 spoke to Lianchao on the phone?</p> <p>4 A. Correct.</p> <p>5 Q. What about Ms. Wang? Did you ever</p> <p>6 speak to her on the phone about this agreement?</p> <p>7 A. I think it was only by Signal. Now,</p> <p>8 let me correct myself. We might have had some</p> <p>9 brief talks on Signal audio.</p> <p>10 Q. Okay.</p> <p>11 A. But I wouldn't have a record of that.</p> <p>12 Q. I understand.</p> <p>13 A. Yes. Here he says, "I don't know who</p> <p>14 will sign," and I said "He," Guo, "proposed you,"</p> <p>15 Lianchao, and asked – because there was a</p> <p>16 question of Yvette doing it, and because Guo told</p> <p>17 us he didn't trust Yvette, and she's a member of</p> <p>18 the Communist Party, and her parents are senior</p> <p>19 people in the Chinese police, that obviously she</p> <p>20 would be an unreliable person. I could never</p> <p>21 figure out why Guo would hire somebody like that,</p> <p>22 but that's why I did not want her to be involved</p> <p>23 in the signing of the contract.</p> <p>24 Q. When did Mr. Guo tell you that about</p> <p>25 Yvette?</p>	<p style="text-align: right;">Page 132</p> <p>1 Chinese secret police, and he still was having</p> <p>2 dialogue with the ministry of state security</p> <p>3 officials, as he even told us.</p> <p>4 So I don't know what his game was. I</p> <p>5 don't know what divisions he was working. I</p> <p>6 presumed he was working on divisions within the</p> <p>7 Communist Party. So if he trusted her after</p> <p>8 saying he didn't trust her, then he's the client.</p> <p>9 It's his prerogative.</p> <p>10 Q. So even though you found information</p> <p>11 that you thought really maybe endangered this</p> <p>12 project, you still went ahead with it?</p> <p>13 MR. SCHMIDT: Objection.</p> <p>14 A. It didn't endanger the project.</p> <p>15 Q. You didn't feel that it did?</p> <p>16 A. No.</p> <p>17 Q. Let's go to SV69. Do you see where you</p> <p>18 wrote –</p> <p>19 A. Pardon me, I'm reading.</p> <p>20 Q. Go ahead. Take a little bit of time.</p> <p>21 A. Just for the record, SV68 confirms what</p> <p>22 I just told you.</p> <p>23 Q. Please wait for a pending question.</p> <p>24 A. 69.</p> <p>25 Q. Do you see where he wrote – or I'm</p>
<p style="text-align: right;">Page 131</p> <p>1 A. I heard about it secondhand because I</p> <p>2 research my clients. The judge asked me about my</p> <p>3 client and I know what he does for his business,</p> <p>4 as well as the people around him. So I found out</p> <p>5 that she was a Communist Party member which Guo</p> <p>6 later confirmed at a lunch at his house after the</p> <p>7 contract was executed. And if I recall, Lianchao</p> <p>8 said something to that same effect, but I don't</p> <p>9 remember if it was before or after the contract</p> <p>10 was executed.</p> <p>11 Q. But even after you knew that or heard</p> <p>12 that, you still continued to work with Yvette</p> <p>13 Wang, right?</p> <p>14 A. Yes.</p> <p>15 Q. Didn't it occur to you that that could</p> <p>16 be a security risk for this project?</p> <p>17 A. Yes, and I told Guo that, and he</p> <p>18 agreed.</p> <p>19 Q. Didn't you feel that that would</p> <p>20 endanger you or your team leader or your team?</p> <p>21 A. Not if it was compartmented. Not if</p> <p>22 there was an anonymity, a barrier between Guo and</p> <p>23 the team that wouldn't endanger them at all. But</p> <p>24 even Guo himself made his fortune through the</p> <p>25 partnership with the number 2 official in the</p>	<p style="text-align: right;">Page 133</p> <p>1 sorry, do you see where you wrote, "If he changes</p> <p>2 his mind on you, it indicates to me he doesn't</p> <p>3 fully trust you. Not a good thing?"</p> <p>4 A. Yes.</p> <p>5 Q. What did you mean by that?</p> <p>6 A. If Guo changes his mind on trusting the</p> <p>7 person he said he trusted, then that's a bad</p> <p>8 sign.</p> <p>9 Q. Do you know why Lianchao didn't end up</p> <p>10 signing the contract?</p> <p>11 A. No.</p> <p>12 Q. Do you know if Mr. Guo stopped trusting</p> <p>13 Lianchao for some reason?</p> <p>14 A. I don't know. He seemed not to trust</p> <p>15 anybody. Toward February 1st, as Yvette had</p> <p>16 noted, Guo had instructed that we only</p> <p>17 communicate through Lianchao again. So he</p> <p>18 regained his trust. But he never told us to stop</p> <p>19 talking to Lianchao.</p> <p>20 Q. So through the life of the agreement,</p> <p>21 you continued to communicate with Lianchao?</p> <p>22 A. Yes.</p> <p>23 Q. Even after Mr. Guo had instructed you</p> <p>24 that you shouldn't, because in his mind, he</p> <p>25 didn't want him to be involved in this anymore?</p>

EASTERN PROFIT CORPORATION LIMITED vs STRATEGIC VISION US, LLC  
J. Michael Waller on 02/08/2019

<p style="text-align: right;">Page 134</p> <p>1 A. He didn't say don't talk to – Guo did 2 not say don't talk to Lianchao. He just said 3 Yvette is going to be the principal point of 4 contact. 5 Q. So you understood that, I guess, let's 6 say, after late December 2017 that there would be 7 two points of contact? 8 A. Yes. She would be the primary point of 9 contact on anything major, but because we had the 10 relationship with Lianchao and Lianchao still had 11 Guo's confidence, we would talk to Lianchao about 12 issues coming up with the project and how we 13 might best address them. Yvette did not seem 14 to – she was not able to answer those questions 15 for us. 16 Q. In the response bubble to your last 17 bubble there, it says, "He has sensed my 18 disappointment with him." 19 A. Yes. 20 Q. Do you understand what Lianchao was 21 talking about there? 22 A. That Guo has sensed Lianchao's 23 disappointment with Guo. 24 Q. Right. Did you understand what sense 25 of disappointment was being discussed?</p>	<p style="text-align: right;">Page 136</p> <p>1 Q. Can you just briefly describe what was 2 conveyed in those discussions? 3 A. Similar to what was spelled out here. 4 There was a cause of frustration with Guo keeping 5 focus, Guo keeping a sensible scope of what he 6 wanted to do. The difference between Guo being 7 unethical in his business practices, which is 8 another reason for a deposit, like a retainer, 9 but it was not a retainer. Defending Guo when I 10 would say I've done research on him and found 11 that he's been involved in certain alleged 12 nefarious activities, what do you think about it. 13 Q. So you raised those issues with 14 Lianchao? 15 A. Yes. 16 Q. What did he say? 17 A. He said, "There's a lot there, John. 18 This is a complicated place. You don't become a 19 billionaire in Communist China by playing by 20 American legal standards." 21 Q. Let me just ask this. Why do you think 22 Lianchao was interested at all in what Mr. Guo 23 was doing or trying to do through this contract 24 with Eastern Profit? 25 A. Because Guo was in the United States</p>
<p style="text-align: right;">Page 135</p> <p>1 A. No. I think Lianchao is very direct 2 and methodical. Guo is really not. 3 Q. Why was it that you thought that 4 Lianchao was disappointed with Guo? 5 A. Because Guo was exaggerating. Guo was 6 being, again, bringing out his wardrobe to show 7 us, showing us his Lego set. 8 Q. So Lianchao was at that meeting? 9 A. Yes. 10 Q. So after that meeting – 11 A. Pardon me. That may have been over the 12 course of two meetings. I think the Tower Bridge 13 Lego set was at a second meeting. 14 Q. But to your mind, Lianchao was 15 disappointed with Guo because of how he carried 16 himself at one or both of these meetings at his 17 apartment? 18 A. Yes, and I believe other things 19 unrelated to our contract. 20 Q. What were those other things? 21 A. I don't know. 22 Q. And Lianchao told you only through this 23 Signal message or did you have a discussion with 24 him about it? 25 A. We had discussions about it.</p>	<p style="text-align: right;">Page 137</p> <p>1 under a form of sanctuary, he can't go back home 2 or he'll be arrested, so he's in opposition to 3 the Communist Party leadership. That jived with 4 both Lianchao's and French Wallop's and my own 5 beliefs that the Communist government of China is 6 an evil regime, and if we can help fight it in 7 any way, great. And if we can make a living 8 doing it, great. And if we have a defector or a 9 deserter who's come to the United States to put 10 up funds to enable that, then this is a win-win 11 proposition. 12 Q. So you and French Wallop and Mr. Guo 13 have kind of an ideological common purpose in 14 toppling the Communist regime in China? 15 MR. SCHMIDT: Objection. Go ahead. 16 A. We thought we did. 17 Q. At the time, let's say, December 2017? 18 A. Right. Later we began to suspect that 19 he was either a double agent or some other kind 20 of provocateur, but we could never prove it. 21 Q. Just looking at the next text bubble, 22 who are Bernie and Judd? 23 A. I don't remember Bernie. Let me think 24 of Bernie. Judd was former Senator Judd Gregg of 25 New Hampshire, G-r-e-g-g.</p>

EASTERN PROFIT CORPORATION LIMITED vs STRATEGIC VISION US, LLC  
J. Michael Waller on 02/08/2019

<p style="text-align: right;">Page 138</p> <p>1 Q. Judd Greg was a friend of Lianchao?</p> <p>2 A. Lianchao had worked for him for many</p> <p>3 years. I knew him and his dad before he even was</p> <p>4 elected.</p> <p>5 Q. Just taking a moment. Who is the other</p> <p>6 friend of Lianchao named Bernie, if you know?</p> <p>7 A. Bernie Yoh, Y-o-h.</p> <p>8 Q. Who is that?</p> <p>9 A. He's deceased. He was a – he fought</p> <p>10 the Japanese and Mao in the Japanese invasion of</p> <p>11 China and the Chinese Civil War as a free China</p> <p>12 fighter.</p> <p>13 Q. For Chiang Kai-shek?</p> <p>14 A. With Chiang Kai-shek, and then came to</p> <p>15 the United States. He mentored me when I was a</p> <p>16 kid in college and he mentored Lianchao. That's</p> <p>17 one of our trust litmus tests.</p> <p>18 Q. I see. So because you had people who</p> <p>19 you both knew that both seemed to like you, you</p> <p>20 figured Lianchao was someone you could trust?</p> <p>21 A. No, there are a lot of people who I</p> <p>22 like who I don't trust, no, not at all. Bernie</p> <p>23 Yoh was a guerilla fighter in the most literal</p> <p>24 sense, and in that kind of insurgency where you</p> <p>25 don't have a commander in control, everything is</p>	<p style="text-align: right;">Page 140</p> <p>1 I said if this ever goes to court, it's</p> <p>2 going to expose the existence of the contract,</p> <p>3 which was never supposed to be known. We kept</p> <p>4 our side of that bargain. It would expose who</p> <p>5 Guo is tracking and why. It would exposure the</p> <p>6 nature and extent of who he's following, and it</p> <p>7 would completely upend the client's worth. I</p> <p>8 expressed doubt at this point that is it worth a</p> <p>9 million dollars to him to risk everything he's</p> <p>10 trying to do.</p> <p>11 Q. Why did you want Lianchao to sign</p> <p>12 instead of someone else?</p> <p>13 A. Because I've known him for such a long</p> <p>14 time and I trusted him, and he was not a member</p> <p>15 of the Chinese Communist Party.</p> <p>16 Q. You're referring to Ms. Wang when you</p> <p>17 say that, as someone who was a member of the</p> <p>18 Chinese Communist Party?</p> <p>19 A. Yes.</p> <p>20 Q. Were any other alternatives provided?</p> <p>21 A. No.</p> <p>22 Q. Do you see where Lianchao wrote, "I</p> <p>23 don't really care as long as we do it"?</p> <p>24 A. Yes.</p> <p>25 Q. Why did Lianchao care so much about</p>
<p style="text-align: right;">Page 139</p> <p>1 based on trusting the guys that you're with.</p> <p>2 He based his life in America the same</p> <p>3 way. Just because he liked you doesn't mean he</p> <p>4 trusted you and vice versa. But he's the type of</p> <p>5 mentor – I say that in the deepest sense of the</p> <p>6 word – that if he mentored me, he got to know me</p> <p>7 very well. I got to know him very well. If he</p> <p>8 mentored Lianchao, the same thing. If you were</p> <p>9 mentored by Bernie Yoh, then that's solid stuff.</p> <p>10 Q. I got you, okay.</p> <p>11 Just turning to the next page, SV70.</p> <p>12 Do you see where you wrote, "Any attempt to do</p> <p>13 anything in court will expose everything, and</p> <p>14 that isn't worth a lousy million dollars for</p> <p>15 either party"?</p> <p>16 A. Yes.</p> <p>17 Q. What were you talking about there?</p> <p>18 A. Because in our verbal discussions,</p> <p>19 Lianchao had related that Guo was very afraid of</p> <p>20 being defrauded and was understandably nervous of</p> <p>21 putting up a million dollars in advance that was</p> <p>22 not in escrow. So he's nervous about that. So</p> <p>23 we have the contract. I didn't know what he</p> <p>24 meant by what would protect him, which is why I'm</p> <p>25 asking.</p>	<p style="text-align: right;">Page 141</p> <p>1 this contract?</p> <p>2 A. He wanted to destabilize the Chinese</p> <p>3 Communist Party.</p> <p>4 Q. He didn't really care about why or who</p> <p>5 was going to do it. He just wanted to hurt them?</p> <p>6 A. He just wanted it done. It was a</p> <p>7 natural synergy between someone who had the</p> <p>8 motivation and the resources and the basic</p> <p>9 information versus the people who could actually</p> <p>10 do the work that would then provide the person</p> <p>11 providing the funds with the means to make use of</p> <p>12 that information over time.</p> <p>13 Q. Just looking at your response. Why did</p> <p>14 you say, "We must report to you and only you for</p> <p>15 quality control"?</p> <p>16 A. Because of a trust issue. Again, same</p> <p>17 reason. Lianchao understood exactly what we were</p> <p>18 doing and how we were doing it. Yvette did not</p> <p>19 seem to know any of that.</p> <p>20 Q. Why did you think that Yvette didn't</p> <p>21 know about any of that?</p> <p>22 A. She couldn't hold a real conversation</p> <p>23 about what we were doing beyond interpreting.</p> <p>24 She didn't know anything about opposition</p> <p>25 research. She didn't know – she didn't seem to</p>

EASTERN PROFIT CORPORATION LIMITED vs STRATEGIC VISION US, LLC  
J. Michael Waller on 02/08/2019

<p style="text-align: right;">Page 142</p> <p>1 know anything about computer research. She would 2 keep saying – using very oversimplified terms 3 that really made no sense. "That's garbage." 4 That's garbage." 5 "Well, what do you mean by 'garbage'?" 6 Tell me specifically what's useful and what's 7 not. She couldn't even say that to us. She 8 couldn't convey anything necessary to conduct the 9 job. 10 Q. Let's talk about when are these 11 conversations occurring that you're describing 12 here? Was this before the contract or after? 13 A. That was on both. The judgment of the 14 information was after the contract, but she could 15 not hold a conversation about the types of work 16 involved prior to the contract. 17 Q. Do you feel that she understood the 18 research agreement? 19 A. Yes, her English was good enough. 20 Q. Did she understand what was going to be 21 provided in terms of a service? 22 You're saying she didn't really 23 understand what the work was? 24 A. Well, for the same reason anybody hires 25 an expert, right? You depend on the expert to do</p>	<p style="text-align: right;">Page 144</p> <p>1 Q. I see. When was that again? 2 A. I believe it was February 1, 2018. 3 It's in a Signal message. 4 Q. Let's look at SV72. Do you see where 5 you wrote, "If it is, my main concern is that you 6 remain as the filter to ensure quality control 7 and ensure that we can protect our sources and 8 methods and ensure that New York doesn't release 9 information prematurely and put the entire 10 project and our people in danger." 11 A. Yes. 12 Q. "New York" there refers to Mr. Guo? 13 A. Yes. 14 Q. Why were you concerned about him 15 releasing information prematurely? 16 A. Because he would go back and forth on 17 us in terms of long-term research that he would 18 release over time, and therefore not jeopardize 19 the existence of the research itself. And then 20 because he was so impulsive, he might release 21 information prematurely and then alert people we 22 were watching that we were watching them. 23 Q. I think you've answered it to an 24 extent. What would be a premature release of 25 information?</p>
<p style="text-align: right;">Page 143</p> <p>1 it, but you would at least want to have a 2 conversation about the modalities with that 3 expert, and she didn't – she wasn't up to having 4 that type of conversation. Guo was, and she 5 interpreted for Guo. 6 Q. I see. Let's go to 72. And just 7 before we talk about that. 8 When did Lianchao stop being your 9 primary point of contact? 10 A. As I recall, it was the last few days 11 of December. 12 Q. Okay. 13 A. Roughly right after Christmas. 14 Q. Before, you said he had gotten back 15 involved again later on. 16 A. Yes. 17 Q. When was that? 18 A. When we were instructed to – well, it 19 was various, because sometimes he would indicate 20 that Guo wanted to convey a message through him 21 verbally and not through Yvette, but in writing 22 it was on February 1st when Yvette instructed me 23 that she would no longer be the point of contact 24 and that I was to communicate only through 25 Lianchao.</p>	<p style="text-align: right;">Page 145</p> <p>1 A. Let's say he releases information on 2 person X while we are still researching person X. 3 Once you know you're being followed – once 4 person X knows he or she is being followed, 5 they're going to make it more difficult to put up 6 countermeasures or do whatever to prevent being 7 observed. So we wanted to make sure that that 8 didn't happen so that we could continue to 9 execute on the project. 10 Q. Did you understand that ultimately 11 information about the research subjects would be 12 released? 13 A. Yes. 14 Q. When did you come to that 15 understanding? 16 A. That was explicit from the beginning. 17 Q. Did Strategic Vision and Ms. Wallop 18 understand that too? 19 A. Yes. 20 Q. So the collateral damage you're talking 21 about there would be what? 22 A. The collateral damage would be the 23 existence that we were invading the personal 24 information of senior members of the Chinese 25 Communist Party, the secret police, and their</p>



EASTERN PROFIT CORPORATION LIMITED vs STRATEGIC VISION US, LLC  
J. Michael Waller on 02/08/2019

<p style="text-align: right;">Page 146</p> <p>1 family members.</p> <p>2 Q. And so you're talking about damage to</p> <p>3 the investigation, not damage to anyone</p> <p>4 personally or anything like that?</p> <p>5 A. People get pushed off buildings for</p> <p>6 these things.</p> <p>7 Q. In this investigation?</p> <p>8 A. This type of work.</p> <p>9 Q. I see.</p> <p>10 A. Putin had two of my editorial board</p> <p>11 members murdered for investigating his</p> <p>12 corruption, so we're very wary of these types of</p> <p>13 issues, as was Guo. He's very afraid of being</p> <p>14 pushed off his own balcony.</p> <p>15 Q. With respect to the members of your</p> <p>16 team, I guess, that were, as you said, pushed off</p> <p>17 a building, when did that occur?</p> <p>18 A. My team? Galina Starovoi-tova.</p> <p>19 (Court reporter interruption.)</p> <p>20 A. G-a-l-i-n-a, last name</p> <p>21 S-t-a-r-o-v-o-i-t-o-v-a. The other name is</p> <p>22 worse. And Yuri Shchekochikhin was poisoned.</p> <p>23 She was murdered in '98, and he was within the</p> <p>24 past – I don't remember exactly the date. There</p> <p>25 were 11 Russians I knew that have been murdered</p>	<p style="text-align: right;">Page 148</p> <p>1 needed to be done.</p> <p>2 He was in a way to not simply be a</p> <p>3 cutout or a translator for Guo, but actually a</p> <p>4 facilitator to iron things out, or to come up</p> <p>5 with new ideas, or to persuade Guo, or to convey</p> <p>6 Guo's concerns adequately to us. So we were</p> <p>7 losing that type of relationship with her as the</p> <p>8 person in charge. That was my concern.</p> <p>9 Q. Because you had never met her before</p> <p>10 this engagement?</p> <p>11 A. Right, and she was a party member, and</p> <p>12 her parents were – her family is in the Chinese</p> <p>13 enforcement unit.</p> <p>14 Q. Turning to the next page. Do you see</p> <p>15 where Lianchao wrote, "He wants me to work for</p> <p>16 him exclusively, which I have to think about"?</p> <p>17 A. Yes.</p> <p>18 Q. What did you understand that to mean?</p> <p>19 A. Because for a while, even predating</p> <p>20 this message, Guo had wanted to hire Lianchao on</p> <p>21 salary or some other compensated basis to work</p> <p>22 for him and only him.</p> <p>23 Q. And that didn't happen?</p> <p>24 A. Lianchao did not want to be dependent</p> <p>25 on Guo.</p>
<p style="text-align: right;">Page 147</p> <p>1 for investigating Putin.</p> <p>2 Q. You also said in this blurb that "There</p> <p>3 was a deep concern that New York did not want to</p> <p>4 include her, but now wants her to be in charge."</p> <p>5 A. Yes.</p> <p>6 Q. What was that concern? First of all,</p> <p>7 I'm sorry, who is "her"?</p> <p>8 A. Yvette.</p> <p>9 Q. What was the concern that you were</p> <p>10 talking about, the "deep concern" there?</p> <p>11 A. Let me read it.</p> <p>12 Q. Sure.</p> <p>13 A. Okay, so your question?</p> <p>14 Q. I'm sorry, my question was what was the</p> <p>15 deep concern?</p> <p>16 A. My deep concern was that Guo was now</p> <p>17 putting Yvette in charge when he said he didn't</p> <p>18 trust her.</p> <p>19 Q. And that concerned you because why?</p> <p>20 A. Well, if the client doesn't trust his</p> <p>21 own person and wants to put her in charge of the</p> <p>22 project, that will complicate the project a lot.</p> <p>23 And both French and I had a relation with</p> <p>24 Lianchao where he was very easy to work with. He</p> <p>25 understood precisely what we were doing and what</p>	<p style="text-align: right;">Page 149</p> <p>1 Q. Was that the only reason that Lianchao</p> <p>2 told you why he did not want to work for Mr. Guo?</p> <p>3 A. He just didn't want to be dependent on</p> <p>4 Guo. He would not take a salary from Guo.</p> <p>5 Q. And that's what I'm saying. Is that</p> <p>6 the only reason he told you he wouldn't take that</p> <p>7 job?</p> <p>8 A. As far as I know.</p> <p>9 Q. Looking down the page on 73. Do you</p> <p>10 see where you mention that "We had agreed in</p> <p>11 writing on December 12th"?</p> <p>12 A. Yes.</p> <p>13 Q. What was agreed upon in writing on</p> <p>14 December 12th?</p> <p>15 A. If memory serves, that was the</p> <p>16 preliminary terms of the draft contract.</p> <p>17 Q. So there was a writing on December 12th</p> <p>18 that memorialized that?</p> <p>19 A. Judging by this, yes.</p> <p>20 Q. Do you know where that document is</p> <p>21 today?</p> <p>22 A. No. Again, I made a point to not save</p> <p>23 unnecessary information.</p> <p>24 Q. I see. So is it possible that there</p> <p>25 was a December 12th draft agreement that you</p>

EASTERN PROFIT CORPORATION LIMITED vs STRATEGIC VISION US, LLC  
J. Michael Waller on 02/08/2019

<p style="text-align: right;">Page 150</p> <p>1 disposed of?</p> <p>2 A. Not draft agreement, but draft terms.</p> <p>3 But then you keep revising drafts and you throw</p> <p>4 away the drafts you don't need.</p> <p>5 Q. By "throw away," what do you mean?</p> <p>6 Like delete an electronic copy?</p> <p>7 A. Yeah, destroy electronic copies and</p> <p>8 paper copies of printouts.</p> <p>9 Q. To your recollection, in connection</p> <p>10 with this contract, what do you remember</p> <p>11 disposing of or destroying?</p> <p>12 A. My habit is to dispose of anything</p> <p>13 that's not needed to execute the project or to</p> <p>14 retain it only for as long as necessary. For</p> <p>15 example, the Signal messages with Yvette, I saved</p> <p>16 those because we were still working with her and</p> <p>17 I would need to go back and refer, but then I</p> <p>18 would periodically delete. But once we got</p> <p>19 served, I saved everything.</p> <p>20 Q. Let's just talk about that. Did you</p> <p>21 delete Signal messages that were part of this</p> <p>22 research agreement?</p> <p>23 MR. SCHMIDT: Objection, but go ahead.</p> <p>24 A. I presume I did.</p> <p>25 Q. Who would those communications have</p>	<p style="text-align: right;">Page 152</p> <p>1 or a week. Sometimes not at all depending on the</p> <p>2 need to refer back to what was corresponded.</p> <p>3 Q. Let's just talk about this blurb I</p> <p>4 mentioned with December 12th. It says, "Please</p> <p>5 call F. We agreed on the deposit. That wasn't</p> <p>6 the problem. However, today Y came back with</p> <p>7 major unreasonable changes to things that we had</p> <p>8 agreed to in writing on December 12th."</p> <p>9 A. Yes.</p> <p>10 Q. What were the major changes that you</p> <p>11 were talking about there?</p> <p>12 A. Let me look at this.</p> <p>13 MR. GRENDI: We'll do a hard stop at</p> <p>14 1:30. I don't know if I'm going to get</p> <p>15 through this by then.</p> <p>16 A. I don't remember precisely what those</p> <p>17 major unreasonable changes were, but they</p> <p>18 involved pricing and the deposit. Guo had</p> <p>19 already agreed with Lianchao present to pricing</p> <p>20 and the deposit. She came back on her own –</p> <p>21 "she" being Yvette came back on her own making</p> <p>22 her own changes. This was not to me, but to</p> <p>23 French Wallop.</p> <p>24 Q. So you weren't present when Yvette</p> <p>25 proposed these changes that were, to your</p>
<p style="text-align: right;">Page 151</p> <p>1 been with?</p> <p>2 A. Anybody necessary to put the work</p> <p>3 together or to execute the work.</p> <p>4 Q. So you might have deleted messages from</p> <p>5 Yvette Wang?</p> <p>6 A. I might have, but whatever is on that</p> <p>7 string. If I have the whole string, I can tell</p> <p>8 you. I certainly deleted some messages, but not</p> <p>9 pertaining to Yvette. Meaning with team 1, for</p> <p>10 example, I deleted everything.</p> <p>11 Q. I see. So you did communicate with the</p> <p>12 leader of team 1 via Signal?</p> <p>13 A. By coded messages within the encrypted</p> <p>14 message and very vague, yes.</p> <p>15 Q. You don't have to tell me which</p> <p>16 application you used, but you used some sort of</p> <p>17 encrypted messaging service?</p> <p>18 A. We used multiple ones, yes.</p> <p>19 Q. But you disposed of those?</p> <p>20 A. Yes.</p> <p>21 Q. Just in terms of your practice, was it</p> <p>22 your practice to delete them a day after you used</p> <p>23 them or immediately?</p> <p>24 A. It depends. Sometimes it's upon</p> <p>25 reading. Sometimes it would be within 48 hours</p>	<p style="text-align: right;">Page 153</p> <p>1 description, major and unreasonable?</p> <p>2 A. I don't think I was.</p> <p>3 Q. French told you about that?</p> <p>4 A. If I recall correctly, yes.</p> <p>5 Q. Okay. Do you know why – I think you</p> <p>6 later wrote, "She has no idea what she's talking</p> <p>7 about"? It's on the next page.</p> <p>8 A. Right. This went on the top of 74?</p> <p>9 Q. Yeah.</p> <p>10 A. Yeah, she had no idea what she was</p> <p>11 talking about.</p> <p>12 Q. And that was something French told you?</p> <p>13 A. Yes.</p> <p>14 Q. You weren't –</p> <p>15 A. Meaning Yvette, according to French,</p> <p>16 has no idea what she, Yvette, is talking about.</p> <p>17 Q. I see. So you weren't – you didn't</p> <p>18 hear Yvette talk about these things because you</p> <p>19 weren't there or on the phone or anything like</p> <p>20 that?</p> <p>21 A. I don't remember. On thinking back. I</p> <p>22 think I might have been privy in New York on that</p> <p>23 meeting with Guo, but I don't remember.</p> <p>24 Q. Just sitting here today, you don't</p> <p>25 recall maybe hearing that or knowing what Yvette</p>



**EASTERN PROFIT CORPORATION LIMITED vs STRATEGIC VISION US, LLC**  
**J. Michael Waller on 02/08/2019**

<p style="text-align: right;">Page 154</p> <p>1 said that was described here as "major  2 unreasonable changes?"  3 A. I don't remember what I heard firsthand  4 from Yvette versus what I heard secondhand from  5 French talking to Yvette. I don't remember in  6 this particular issue. Yvette had come back with  7 her own handwritten changes to the contract that  8 were objectionable. I don't know where that  9 version of the contract is or if it exists or  10 what.  11 Q. Describe how you know about those  12 handwritten notes on the contract.  13 A. French showed me.  14 Q. You saw the physical document?  15 A. Yes.  16 Q. And it's French's document, not your  17 document?  18 A. Yes, correct.  19 (*r) MR. GRENDI: We will just put a pin in  20 that one. If that document still exists, we  21 would like to have it produced.  22 Q. Do you remember what was handwritten on  23 that document by Yvette?  24 A. No.  25 Q. Let me just ask you about one last</p>	<p style="text-align: right;">Page 156</p> <p>1 then had brought in various Iranian opposition  2 factions together to help them put aside their  3 differences and to set up the basis for a  4 government in exile or a government that could  5 take place once the present regime was toppled.  6 Q. I see. So the – what your team can do  7 for that group, were you talking about  8 investigatory research or something else?  9 A. No. This is if and when Guo would  10 succeed in destabilizing the Chinese regime, we  11 could help with protest organizing, with helping  12 unarmed people develop defensive methods against  13 armed force and riot police and armored vehicles  14 and so forth.  15 Actually, certain design flaws in  16 Chinese-built armored vehicles that the Iranians  17 and others were using to help the civilian  18 protesters defend themselves, and then to get  19 organized into some sort of a provisional  20 government and set up an interim constitution  21 that they could agree on or something like that.  22 Q. But this is not about investigatory  23 research?  24 A. No, this was not part of the contract.  25 This was part of what was the larger vision.</p>
<p style="text-align: right;">Page 155</p> <p>1 thing with this thread here and I'll take lunch.  2 If you could go to 67 – or 76. Do you see that  3 blurb that you wrote on January 4th at 3:25 a.m.?  4 A. That sounds like the right time. Yes.  5 Q. Who's Amir? – and I'm going to butcher  6 this, the pronunciation.  7 A. Fakhravar.  8 Q. Who is Amir F?  9 A. He is a leader of an Iranian opposition  10 student movement.  11 Q. You said here, "I helped him establish  12 seven years ago?"  13 A. Yes.  14 Q. Was that work you did for your own  15 company or working for someone else?  16 A. It was working for a non-profit and  17 working on my own, because it was the right thing  18 to do.  19 Q. You said, "this will be good for  20 New York and your present guest to see. It shows  21 in real life what our team can do."  22 A. Yes.  23 Q. What did you mean by that?  24 A. We helped organize student protests  25 inside Iran and in other parts of the world and</p>	<p style="text-align: right;">Page 157</p> <p>1 MR. GRENDI: Let's break for lunch.  2 Thank you very much.  3 THE VIDEOGRAPHER: Off the record at  4 1:28.  5 (Whereupon, a luncheon recess was taken  6 at 1:28 p.m.)  7 THE VIDEOGRAPHER: Back on the record  8 at 2:15.  9 Q. Hello again. Mr. Waller, did there  10 come a time when Strategic Vision got a wire for  11 \$1 million in connection with this research  12 assignment?  13 A. It got two wires of just under half a  14 million dollars apiece from a Hong Kong company.  15 Q. And when was that?  16 A. I don't know the exact date. It wasn't  17 my account, but I think it was January 2nd.  18 Q. Of 2018?  19 A. Yes.  20 Q. Was that before or after the research  21 agreement was signed?  22 A. Before.  23 Q. How did you first hear about these –  24 I'll call them "one wire" if that's okay, the two  25 of them the same day?</p>

EASTERN PROFIT CORPORATION LIMITED vs STRATEGIC VISION US, LLC  
J. Michael Waller on 02/08/2019

<p style="text-align: right;">Page 158</p> <p>1 A. As long as it's clear that there are 2 two. 3 Q. Let's call them "the two 4 half-million-dollar wires," how's that? 5 A. Okay. 6 Q. When did you first hear about the two 7 half-million-dollar wires? 8 A. Right around the time French Wallop 9 realized that it had been deposited in her 10 account, in her company's account. 11 Q. So January 2nd, January 3rd of 2018? 12 A. Right. 13 Q. What was your response or reaction to 14 hearing that news? 15 A. I thought it was very curious because 16 we hadn't signed the contract yet. 17 Q. Are there any issues about where the 18 money had come from or questions about where it 19 was from? 20 A. Yes. We were very upset that it had 21 come straight from a Hong Kong bank straight to 22 Strategic Vision's bank because that was not what 23 we had agreed with Guo. 24 Q. What was that previous agreement you're 25 referring to?</p>	<p style="text-align: right;">Page 160</p> <p>1 speaks English. 2 Q. When the wire came in, or the two 3 half-million-dollar wires came in, did you have a 4 discussion with Mr. Guo or Lianchao or Yvette 5 about this issue and the fact that a circuitous 6 payment route was not used? 7 A. I believe I did with Lianchao right 8 away, as soon as I found out, and I know that 9 French Wallop certainly did with Yvette. 10 Q. When did you speak to Lianchao about 11 that? Was it January 3rd? 12 A. I'm guessing. I don't know, but it was 13 soon after. 14 Q. Was that an in-person meeting or a 15 telephone call? 16 A. They were never by telephone. It was 17 in person. 18 Q. So you met with him where? In 19 Washington, D.C.? 20 A. The D.C. area, greater D.C. area. 21 Q. What did Lianchao say when you told him 22 this? Did he know already? 23 A. No. He expressed surprise. 24 Q. Did you have any doubt that the money 25 was from Eastern Profit when you received it?</p>
<p style="text-align: right;">Page 159</p> <p>1 A. That we would establish a circuitous 2 route through which to make payments in order to 3 avoid detection by the Chinese government. 4 Q. And so what were the details of that 5 circuitous route? What was contemplated or 6 discussed? 7 A. Sending it through various accounts in 8 different countries where it would escape 9 detection from the Chinese. 10 Q. Were any details of which entities 11 would be used to do that discussed? 12 A. That had remained to be settled. 13 Q. Okay. When did you or Ms. Wallop plan 14 on having that conversation with the folks from 15 Eastern Profit? 16 A. After signing the contract. 17 Q. When did you discuss this circuitous 18 payment route idea with Mr. Guo or whoever? 19 A. We discussed it on several occasions in 20 December, throughout December when we were going 21 over how we would do this, how we would arrange 22 payment and how we would keep security. Guo 23 agreed, and we spoke about it in the presence of 24 Lianchao and Yvette both separately acting as 25 interpreters, and also in English with Guo, who</p>	<p style="text-align: right;">Page 161</p> <p>1 A. Yes. 2 Q. You had other clients that were maybe 3 going to send a million dollars? 4 A. No, but somebody gets a million dollars 5 from a company they never heard of unrelated to 6 any contract that had been signed, it's rather 7 different. 8 Q. But Yvette did eventually tell – well, 9 strike that. 10 Did you ever hear that Yvette told 11 French Wallop the wire was from Eastern Profit? 12 A. Never from Eastern Profit. 13 Q. From anyone else? 14 A. It would have – we understood it to 15 have been authorized by Guo. So we didn't say 16 hey, Eastern Profit, you haven't paid us. Some 17 other company paid us, but we're not gonna – we 18 presumed that it was from Guo. 19 Q. I see. 20 A. Eastern Profit is a fake entity. We're 21 talking about Guo. It's a cutout for Guo, so we 22 can dispense with that fiction. 23 Q. We're not going to dispense with any 24 fiction. There's no fiction here, but let's just 25 continue.</p>

EASTERN PROFIT CORPORATION LIMITED vs STRATEGIC VISION US, LLC  
J. Michael Waller on 02/08/2019

<p style="text-align: right;">Page 162</p> <p>1 Did you ever discuss this research 2 assignment with Bill Gertz or William Gertz? 3 A. Only at the beginning when he was 4 facilitating it. 5 Q. Can you describe what that discussion 6 was and where that was? 7 A. I don't recall. 8 Q. Can you tell me when you talked to 9 Bill Gertz? 10 A. Probably November, December of 2017. 11 It was pre-contract. 12 Q. What was the nature of the discussion? 13 What was discussed? 14 A. I thanked him for putting this 15 together. I asked him if he wanted to be a part 16 of it. He said no. 17 Q. What do you mean by "be a part of it"? 18 A. He's an investigative journalist, has 19 been for more than 30, 35 years ever since I've 20 known him, so I wondered if he wanted to be part 21 of it. And since Guo trusted him, he would be an 22 ideal person to have on board. 23 Q. In terms of an intermediary or someone 24 providing services? 25 A. Providing services. He has excellent</p>	<p style="text-align: right;">Page 164</p> <p>1 Q. So like social media or print 2 journalism, things like that? 3 A. Yeah, public diplomacy, just messaging. 4 Q. Let's go to the next exhibit. 5 MR. GRENDI: Exhibit 6. 6 (Waller Exhibit 6, Document entitled 7 "Anita Yui Suen", marked for 8 identification.) 9 MR. GRENDI: Joe, do you have any 10 objection to me giving this to co-counsel, 11 co-defendant? 12 MR. SCHMIDT: No, that's fine. 13 Q. Do you recognize this document? 14 A. Yes. 15 Q. Generally speaking, what is this? 16 A. This is the document that Miles Kwok 17 provided for us for the research project. This 18 is his list of targeted names. 19 Q. Is this the list of fish that when 20 they're describing it? 21 A. Yes. 22 Q. When did you first see this document? 23 A. As I recall, shortly after the contract 24 was executed, or signed. It was shortly after it 25 was signed.</p>
<p style="text-align: right;">Page 163</p> <p>1 contacts in the intelligence community. 2 Q. I see. That was the only time you ever 3 spoke to Bill Gertz about this matter? 4 A. Yeah, as far as I can tell. It might 5 have been a casual hey, things are still going. 6 It was nothing in any detail, not in violation of 7 any confidence. 8 Q. I wasn't saying it was or wasn't. I'm 9 just asking if you spoke to Bill Gertz about this 10 agreement or research agreement after your 11 initial meeting with him that you described from 12 November or December of 2017. 13 A. I mean, we've been friends for a long 14 time, so more than a how's-it-going-type thing, 15 nothing of substance. 16 Q. And you're still in touch with 17 Bill Gertz as friends or colleagues? 18 A. Yeah. I'm working with him and 19 Rich Higgins on another project. 20 Q. Another investigation project? 21 A. An information messaging project. 22 Q. What do you mean by that? Is that a 23 different service than investigatory research? 24 A. Yeah, it's putting out a message as 25 opposed to investigating.</p>	<p style="text-align: right;">Page 165</p> <p>1 Q. Does January 8th or 9th sound right? 2 A. Approximately. 3 Q. How did you receive it? 4 A. On a USB drive that Yvette had provided 5 to French Wallop. 6 Q. So you received the USB drive with the 7 information in Exhibit 6 from French Wallop, 8 then? 9 A. Yes. 10 Q. Who had gotten the information from 11 Yvette Wang? 12 A. Yvette had handed – she had given 13 us – or she had given French, rather, USB drives 14 that were corrupted. So French had to go up to 15 New York to get uncorrupted versions of the drive 16 and then bring it down. That's what was on this. 17 This document was on that drive. 18 Q. Right. So did you see this document 19 from the initial drive that was given to 20 French Wallop on January 6th or from, as you just 21 mentioned, drives that were given subsequently? 22 A. As I recall, I did not see anything in 23 the corrupted drives. This was the non-corrupted 24 drive a few days later. 25 Q. Okay. Do you recall when the</p>

**EASTERN PROFIT CORPORATION LIMITED vs STRATEGIC VISION US, LLC**  
**J. Michael Waller on 02/08/2019**

<p style="text-align: right;">Page 166</p> <p>1 non-corrupted drives were given to Strategic  2 Vision?  3 A. I can't say the day, but it was a few  4 days later.  5 Q. A few days after what day?  6 A. A few days after Strategic Vision  7 received the corrupted drives.  8 Q. When was that?  9 A. Sometime in the first week of January.  10 Q. Do you know if it was January 6th, the  11 day that the contract was executed?  12 A. I don't remember the exact date.  13 Q. Okay. And so once you got a  14 non-corrupted version, what did you do with this  15 document?  16 A. We immediately gave that to the team 1  17 leader to start work.  18 Q. Had you arranged in advance for the  19 team 1 leader to be kind of ready to do this  20 project?  21 A. Yes.  22 Q. When did you first talk to the team 1  23 leader about this project?  24 A. In late November or early  25 December 2017.</p>	<p style="text-align: right;">Page 168</p> <p>1 request?  2 A. That it's not legal to do from the  3 United States, but we would see what we could do.  4 So we did a capabilities test to see if it was  5 possible and found that yes, it is possible or it  6 was possible.  7 Q. You had mentioned before that the  8 team 1 leader was involved in this. Did you  9 dispatch the team 1 leader to see if it was legal  10 to do in another country?  11 A. Yes.  12 Q. What did the team 1 leader tell you?  13 A. Yes, it's legal. He gave screenshots  14 of the inside of the CITIC security server  15 showing that indeed we had the capabilities to  16 break into the server.  17 Q. Did you show these screenshots – you  18 said you showed screenshots of this to Mr. Guo  19 and Lianchao Han?  20 A. Yes.  21 Q. When was that?  22 A. Before the contract was executed, in  23 mid-December.  24 Q. Where was that meeting?  25 A. At Guo's residence.</p>
<p style="text-align: right;">Page 167</p> <p>1 Q. Is it fair to say as soon as you heard  2 about this engagement, you thought of the team 1  3 leader as the go-to guy?  4 A. As one of the go-to guys. So we had  5 him do a test which we presented to Guo. He was  6 very satisfied with the results and wanted us to  7 continue. That was in early December,  8 mid-December.  9 Q. Let's talk about that test. How did  10 that test come up? Was that requested by Mr. Guo  11 or Ms. Wang or Lianchao?  12 A. Guo requested it, with Lianchao being  13 present and French Wallop being present. I don't  14 remember if Yvette was present. I think she was  15 not present at that meeting.  16 Q. What was the request?  17 A. He wanted to hack into Anita Suen's  18 personal data, including the server of CITIC,  19 which is the Chinese state-owned – I believe  20 CITIC is C-I-T-I-C, China International  21 Investment Corporation and Trade. Her email  22 address was residing on the CITIC security  23 server, and Guo wanted to see if we could access  24 that server.  25 Q. What did you say in response to that</p>	<p style="text-align: right;">Page 169</p> <p>1 Q. Did you present – so there were  2 computer screenshots on a laptop that you  3 brought?  4 A. He didn't want a laptop. He didn't  5 want electronic. That was on paper.  6 Q. That was on paper?  7 A. That was before he said he didn't want  8 anything on paper. He had electronic security in  9 his residence, so we couldn't use computers.  10 Q. Did you hand him this information in  11 paper for him to keep or did you just show it to  12 him?  13 A. I don't recall if he kept it or not.  14 Q. Do you still have a copy of that?  15 A. Yes.  16 (*r) MR. GRENDI: I'm going to call for the  17 production of that document if it has not  18 already been produced, but we'll see. We  19 got a lot of information recently.  20 Q. Did you show Mr. Guo and Lianchao bank  21 account information for Anita Suen?  22 A. No.  23 Q. What information was on those  24 screenshots? Can you describe those screenshots?  25 A. Yes, it was a screenshot of the code,</p>

EASTERN PROFIT CORPORATION LIMITED vs STRATEGIC VISION US, LLC  
J. Michael Waller on 02/08/2019

<p style="text-align: right;">Page 170</p> <p>1 of the server code showing that it was at the 2 doorstep of the server, so to speak. It was not 3 a break-in of the server. It was just to show 4 we're right at the front door and we can go in. 5 Q. During this discussion, did you refer 6 to this server as like a wall that you could peer 7 over? 8 A. It was some kind of metaphor. We had 9 discussions about how to see the information, and 10 there were different ways to do it, and he just 11 wanted to brute force attack which is not a 12 feasible thing to do because that tells the 13 target that you're after them. So there are 14 other ways to get access to it, and we described 15 to him those ways. 16 Q. I just want to understand that a little 17 better. So if you were to, as you described it, 18 break into the server, that would alert the 19 server host to the fact that there was a problem? 20 A. Yes. 21 Q. Why would that be problematic in terms 22 of doing investigatory research? 23 A. That you couldn't see what's inside. 24 Q. Because why? I'm asking you to explain 25 this. I understand that it's perhaps intuitive.</p>	<p style="text-align: right;">Page 172</p> <p>1 You described kind of one screenshot. How many 2 screenshots were there that you showed at this – 3 A. Two or three. 4 Q. So what were they one by one, if you 5 don't mind just kind of going through to the 6 extent that you remember? 7 A. It's a shot of – remember MS DOS? 8 Before Windows? 9 Q. Sure. 10 A. It looks kind of like that. 11 Q. So it's like a command prompt? 12 A. Yes. 13 Q. What did that – I guess that's one of 14 the screenshots, right? 15 A. Yeah. The other was related. The 16 other one or two were related to that one. They 17 all had that sort of – 18 Q. DOS look? 19 A. Yeah. 20 Q. What would that information mean to a 21 layperson? Did you explain what the screenshots 22 really meant? 23 A. Yes. 24 Q. Please explain to me what those 25 screenshots meant.</p>
<p style="text-align: right;">Page 171</p> <p>1 A. The server would put up its own 2 defenses to close down any access to it, or even 3 shut itself down, and that it would alert the 4 server administrator that there was an issue. 5 Q. Did this information include anything 6 about there being a huge amount of illegal money 7 in the bank account that you were looking at? 8 A. We weren't looking at a bank account. 9 Guo wanted us to look at bank accounts for 10 illegal money. 11 Q. Was that research that Strategic Vision 12 was willing to do? 13 A. We were willing to do it wherever it 14 was legal to do it. Guo instructed us to break 15 into – try to break into American bank accounts, 16 and we said no, that's a crime. We advised him 17 of certain things he wanted to do, and we told 18 him these are crimes. We're not going to do 19 them. And he got very upset after earlier saying 20 he didn't want to break U.S. law. 21 Q. How did he get upset? Can you describe 22 that? Was that during this meeting where you had 23 showed the server? 24 A. I think it was a subsequent one. 25 Q. I just want to stick with this meeting.</p>	<p style="text-align: right;">Page 173</p> <p>1 A. So we're right at the front door of 2 Anita Suen's CITIC security email account, but we 3 haven't opened the door. 4 Q. Did you convey to Mr. Guo or Lianchao 5 that you could do that? 6 A. Yes. 7 Q. But you explained that you weren't 8 going to do that right now because it would 9 compromise the investigation in the future? 10 A. Yes. 11 Q. What was their reaction to this 12 presentation? 13 A. That was fine. That presentation was 14 what convinced Guo to proceed with the contract. 15 Q. Did Strategic Vision subsequently 16 access that CITIC account? 17 A. No. 18 Q. And why not? 19 A. As I recall, it was because Guo was 20 insisting on a brute force attack, and we were 21 telling him that's an unprofessional way to do 22 it. It's going to defeat your purpose 23 completely, and they'll just throw up more 24 security and you'll never get what you want. 25 Allow us to do it by another means.</p>

EASTERN PROFIT CORPORATION LIMITED vs STRATEGIC VISION US, LLC  
J. Michael Waller on 02/08/2019

<p style="text-align: right;">Page 174</p> <p>1 Q. Did there come a time when he just 2 said, do it by brute force. I don't care what it 3 takes. Just access that account? 4 A. Not on that one particularly, but on 5 another one, that's when we told him it was 6 illegal and he got angry. 7 Q. So Strategic Vision never accessed 8 Anita Suen's CITIC account? 9 A. No. If I recall correctly, it was that 10 team 1 reported they went back to access it, and 11 there were other people trying to access that 12 same account. Guo had said to us on two 13 occasions that he had three or four other teams. 14 Team 1 raised a red flag for me. Then 15 when I met with the team 1 leader, he explained 16 it. He said they stopped the activity because 17 they did not want to damage anything that Guo's 18 other teams might be doing. 19 Q. Where was that meeting with the team 1 20 leader? 21 A. In Europe. 22 Q. In which part? 23 A. It would be in Ireland. No, pardon me. 24 That one was in the United States. 25 Q. The team 1 leader was in the</p>	<p style="text-align: right;">Page 176</p> <p>1 the job would be. The European ones – that was 2 before the contract. The European ones were to 3 have him deliver the, quote, reports on the USB 4 drives after the contract was signed. 5 Q. So those are the only two categories of 6 reasons to meet? 7 A. Was to coordinate the scope of the 8 work, the nature of the work, the verification 9 that the work was being done, and then the work 10 product. 11 Q. Just going back to this Exhibit 6. 12 What did you do with this information once you 13 got it? 14 A. I gave it to team 1. 15 Q. Where was that? 16 A. That was by USB drive that I handed to 17 team 1 in Washington, D.C. or Arlington, 18 Virginia. 19 Q. And then did you understand that team 1 20 was going to fly off to Europe to use the data? 21 A. Yes, immediately. 22 Q. What date was that? 23 A. Within 24 hours of receiving the USB 24 drive. 25 Q. So on or around January 9th,</p>
<p style="text-align: right;">Page 175</p> <p>1 United States, and you met with him here? 2 A. Yes, on that occasion. 3 Q. How many times did you meet with the 4 team 1 leader? 5 A. I may have to amend this statement 6 later when I see the written transcript because 7 I'm not exactly sure of certain dates. 8 MR. SCHMIDT: Just do the best you can. 9 Don't speculate. 10 MR. GRENDI: Yeah, sure. 11 Q. How many times did you meet with the 12 team 1 leader in connection with this engagement? 13 A. Maybe eight or ten times. 14 Q. And some of those meetings were in the 15 United States? 16 A. Yes. 17 Q. And some of them were in Ireland? 18 A. Ireland and Germany. 19 Q. Anywhere else? 20 A. No. 21 Q. So when did those meetings begin? 22 A. The U.S. ones or the foreign ones? 23 Q. The first one, wherever it was? 24 A. The U.S. ones were to arrange the 25 parameters of the – set the parameters of what</p>	<p style="text-align: right;">Page 177</p> <p>1 January 10th? 2 A. Roughly. It was very rapid. 3 Q. Was the leader of team 1 like on 4 standby, kind of waiting to get the information 5 in the United States – 6 A. Yes. 7 Q. – so that he could – 8 A. Pardon me. I didn't mean to intrude. 9 MR. SCHMIDT: Let him finish the 10 question even if you know where it's going. 11 THE WITNESS: Okay. 12 Q. Looking at this document. Did you 13 review it after receiving it to verify the 14 contents? 15 A. Yes. We printed it out to be able to 16 look at it, write it up, make sure we understood 17 what was in it, what things meant, what certain 18 of the relations were, and then to – and what 19 certain of the documentation was that was 20 displayed in them. 21 Q. So when you first reviewed it, did you 22 have any reason to think the information included 23 was inaccurate or wrong? 24 A. No. 25 Q. You kind of indicated earlier that you</p>



EASTERN PROFIT CORPORATION LIMITED vs STRATEGIC VISION US, LLC  
J. Michael Waller on 02/08/2019

<p style="text-align: right;">Page 178</p> <p>1 thought some of the information was wrong. Can</p> <p>2 you please – you don't have to say their names,</p> <p>3 but just point to the numbered individuals where</p> <p>4 you think that applies?</p> <p>5 A. I can't point to them off the top of my</p> <p>6 head, but there were two data points here. First</p> <p>7 was from team 1 that said that they were – they</p> <p>8 found two and possibly three that were wrong.</p> <p>9 And then Lianchao said that three and possibly</p> <p>10 four were wrong.</p> <p>11 Q. So one of the issues you encountered</p> <p>12 you're saying is that the information provided</p> <p>13 was what, inaccurate? Or what did the leader of</p> <p>14 team 1 tell you?</p> <p>15 A. The leader of team 1 said that at least</p> <p>16 one of the names was misspelled in Mandarin, and</p> <p>17 since there were various transliterations of the</p> <p>18 names in English, they needed the accurate</p> <p>19 transliteration. Then they suspected that others</p> <p>20 were simply false people, false persona.</p> <p>21 Q. What do you mean by that? That they</p> <p>22 were not real people or they were fake documents?</p> <p>23 What does that mean?</p> <p>24 A. Team 1 suspected that they were not</p> <p>25 real people. They were false identities for the</p>	<p style="text-align: right;">Page 180</p> <p>1 A. In the first week in February, right</p> <p>2 after Yvette instructed us to find a different</p> <p>3 means of getting data.</p> <p>4 Q. So what did they report to you was a</p> <p>5 problem with the list of fish?</p> <p>6 A. They said there were many problems with</p> <p>7 this list of fish. First, that there were</p> <p>8 several passports that were false, and they</p> <p>9 suspected they had been forged from a Chinese</p> <p>10 infiltration of a passport office in Texas.</p> <p>11 They found – the most important thing</p> <p>12 they found was that all of the main 15 names had</p> <p>13 been designated by federal authorities as records</p> <p>14 protected, and that it was a crime to try to get</p> <p>15 their records, because these individuals were</p> <p>16 somehow either the subject of an active U.S.</p> <p>17 criminal or counterintelligence investigation or</p> <p>18 were Chinese nationals collaborating with the</p> <p>19 U.S. authorities.</p> <p>20 Q. Okay. So what does "records protected"</p> <p>21 mean to you?</p> <p>22 A. The way we were told by the research</p> <p>23 team was – and by others when we looked at it, I</p> <p>24 had not heard the term before – that any records</p> <p>25 pertaining – any official records pertaining to</p>
<p style="text-align: right;">Page 179</p> <p>1 purposes of laundering money or committing other</p> <p>2 illegal activity.</p> <p>3 Q. In other words, if I remember from the</p> <p>4 "Shawshank Redemption," it's a fake person.</p> <p>5 Someone who doesn't even exist?</p> <p>6 A. Yeah, that's the way we understood it.</p> <p>7 Q. Were there any other issues with the</p> <p>8 list of fish here?</p> <p>9 A. For team 1?</p> <p>10 Q. Yeah.</p> <p>11 A. We found that some of the documents</p> <p>12 that are displayed here were themselves false.</p> <p>13 Q. What do you mean by that? That they</p> <p>14 were forgeries?</p> <p>15 A. Yes. The Canadian passport of one of</p> <p>16 the individuals was a forgery.</p> <p>17 Q. Anything else you can remember about</p> <p>18 what you've described as fake documents?</p> <p>19 A. Not from team 1. From team 2 we found</p> <p>20 some more American passports that were forgeries.</p> <p>21 Q. Let's describe that. Team 2 – who ran</p> <p>22 team 2?</p> <p>23 A. That was the ASOG, A-S-O-G, in Texas.</p> <p>24 Q. When did you give this information to</p> <p>25 ASOG?</p>	<p style="text-align: right;">Page 181</p> <p>1 those individuals were protected by the</p> <p>2 U.S. government. Meaning you could not go to,</p> <p>3 say, the state of California contact to get their</p> <p>4 driver's license number. That would be a crime.</p> <p>5 Q. How would a person know that it was a</p> <p>6 crime?</p> <p>7 A. You don't know unless you know whose</p> <p>8 record is protected.</p> <p>9 Q. Right.</p> <p>10 A. We didn't know, so we had no idea. So</p> <p>11 we related this to Guo, hey, this is a crime to</p> <p>12 do it. Let's figure out something else or get</p> <p>13 another list of fish.</p> <p>14 Q. I want to go back there. You're saying</p> <p>15 that these people have information that's in the</p> <p>16 public domain that you could otherwise, if they</p> <p>17 weren't records-protected, access?</p> <p>18 A. Or they're in the semipublic domain.</p> <p>19 Q. Okay. Something that a regular</p> <p>20 investigator could find if they use databases or</p> <p>21 other sources to get that information?</p> <p>22 A. Right. Some of these are protected,</p> <p>23 meaning they're not officially accessible, but if</p> <p>24 you have a contact in the system, you can ask</p> <p>25 them and they'll run a check for you. So you</p>

EASTERN PROFIT CORPORATION LIMITED vs STRATEGIC VISION US, LLC  
J. Michael Waller on 02/08/2019

<p style="text-align: right;">Page 182</p> <p>1 can't necessarily mine the data by computer 2 yourself. 3 Q. Right. So how would a person know that 4 a particular individual was records-protected? 5 A. That's where the ASOG group came in 6 because these were people who had U.S. government 7 clearances and who worked with people on the 8 inside, and as they were researching each 9 individual, they found each and every one was 10 records-protected. 11 Q. So ASOG described this to you? 12 A. Yes. 13 Q. Did you hear this through French? 14 A. French and I both went to the Dallas 15 area to meet with them twice. 16 Q. Who was it at ASOG that told you this 17 information? 18 A. It was a group. It was the CEO Adam 19 Kraft, with a K, and it was the CFO who was 20 there, Russell – his last name began with an 21 R – and the investigators themselves, the actual 22 computer guys. 23 Q. So they said we can't get information 24 about these 15 people in the United States 25 because they're records protected?</p>	<p style="text-align: right;">Page 184</p> <p>1 by the federal government. So 100 percent of the 2 15 were records-protected. 3 Q. So you're saying there's a database 4 where the federal government has a list of people 5 who are records-protected? 6 A. I don't know how that works. All I 7 know is that they would do research on, let's 8 say, person number 1 and come back with a reply 9 from someone in the federal system, this person's 10 records-protected. Okay, how about person number 11 2? The same thing, and so on. So I don't know 12 if they did it by iteration or there's a 13 database. 14 Q. Did ASOG give you any documentation 15 about this records-protected designation that 16 they told you about? 17 A. No. 18 Q. It was just conveyed orally that each 19 and every one of the people on this list is, 20 quote-unquote, "records-protected"? 21 A. Yes. These are vetted cleared people 22 with active security clearances, so I had no 23 reason to doubt them. 24 Q. Cleared with whom? 25 A. Whatever federal agencies that they</p>
<p style="text-align: right;">Page 183</p> <p>1 A. Yes. 2 Q. Did the records protection prevent 3 Strategic Vision from getting information about 4 these individuals outside of the United States? 5 A. Well, this was the question because the 6 ASOG people said they think that, judging by this 7 type of search, they think that Miles Kwok is a 8 double agent for the Chinese government, or is 9 representing a different faction of the Chinese 10 secret service, or is involved in criminal 11 activity, so it was a big red flag. 12 We went back to – by this time – this 13 was in February, so it was after Yvette had told 14 us to only communicate with Lianchao, and so we 15 told Lianchao and then asked for guidance. 16 Q. So you didn't find out about this 17 record protection issue until after you had 18 delivered the 80 gigabytes of data on about 19 January 30th? 20 A. That's correct. 21 Q. Can you just describe exactly what the 22 ASOG folks encountered that tipped them off about 23 this records protection issue? 24 A. Yes. That every single person on the 25 list, all 15 of them all had the same designation</p>	<p style="text-align: right;">Page 185</p> <p>1 either had worked with or were working with. 2 Q. Was it your understanding that the 3 folks at ASOG worked for the federal government 4 directly? 5 A. They had had – so when you work for 6 the federal government and then you go into the 7 private sector, you can still have an active 8 clearance, so it was that type of a relationship 9 that they had. 10 Q. So folks at ASOG were all in the 11 private sector now? 12 A. Yes. 13 Q. But they still had security clearance 14 with the federal government? 15 A. That was my understanding, yes. 16 Q. So they could see like classified 17 documents? 18 A. Or they could talk to people who were 19 cleared. It doesn't necessarily work that way, 20 but they could communicate with people in the 21 system who were cleared and say, hey, we want a 22 run on this person. What do you have? And that 23 person would come back and say sorry, that's an 24 RP, records protected. 25 Q. So after you dispatched team 1 to</p>

EASTERN PROFIT CORPORATION LIMITED vs STRATEGIC VISION US, LLC  
J. Michael Waller on 02/08/2019

<p style="text-align: right;">Page 186</p> <p>1 Europe, how did you monitor the research process, 2 if at all? 3 A. I would meet with the team 1 leader 4 approximately every week during the beginning of 5 the contract. 6 Q. Let's see if you remember. What was 7 the first monitoring meeting you had with the 8 team 1 leader after the contract was signed? 9 A. It was between January 17th and 10 January 20th, if I recall correct. 11 Q. Just going back to this information in 12 Exhibit 6. Was this more information than you 13 normally get when you start an investigation 14 project? 15 A. This was very specific, and Guo 16 explained the meaning of it. It was more in the 17 sense that Guo said he paid a quarter of a 18 billion dollars for this file that we have here 19 as Waller 6. He paid \$250 million, so he said. 20 Q. Did you believe that statement? 21 A. No. 22 Q. You think maybe there was a translation 23 issue there? 24 A. No, there was not. I said, "Billion or 25 million?" I couldn't believe it. Guo insisted.</p>	<p style="text-align: right;">Page 188</p> <p>1 Q. What's kind of the bare minimum 2 starting point? 3 A. Place of work or residence, nationality 4 even. 5 Q. So there's more than that kind of 6 information in here, right? 7 A. Yes. 8 Q. But it's not the most information you 9 were ever given? 10 A. Oh, no, I've had far more detailed 11 information. 12 Q. Did you get any more information about 13 how Eastern Profit or Mr. Guo acquired this list 14 of names and information? 15 A. Guo told us that he had it done 16 himself. He commissioned it all himself through 17 years of work through other research companies 18 worldwide. 19 Q. So peers or competitors of Strategic 20 Vision or yourself? 21 A. Yeah, yeah. But also my suspicion was 22 that he also got this information from the 23 Communist Chinese secret police because of the 24 nature of how some of it is so specific in China; 25 like passports, for example.</p>
<p style="text-align: right;">Page 187</p> <p>1 Lianchao later said, "He likes to exaggerate." 2 Q. The information in here includes dates 3 of birth – 4 A. Right. 5 Q. – ID numbers, locations, passport 6 numbers, is that right? 7 A. Yes. 8 Q. Is that more information than Strategic 9 Vision or you usually start with when you begin 10 an investigation? 11 A. I can't speak for Strategic Vision, but 12 speaking personally it depends on the case. It 13 depends on the nature of the information that we 14 get. Sometimes it's even more specific. 15 Q. Is this sort of information helpful in 16 terms of jump-starting or accelerating an 17 investigation? 18 MR. SCHMIDT: Objection. 19 A. You can't start an investigation 20 without a starting point. This was the starting 21 point. 22 Q. I'm saying have you ever started an 23 investigation just with someone's name? 24 A. You need more than just a name, 25 generally.</p>	<p style="text-align: right;">Page 189</p> <p>1 Q. Regarding the research, what was your 2 understanding of why Eastern and Mr. Guo or 3 whoever wanted this information? 4 A. He wanted it to tear apart the Chinese 5 Communist Party leadership. 6 Q. So was it your understanding that, once 7 he got the research information from Strategic 8 Vision or you, that he would then publicize or 9 otherwise disseminate that information? 10 A. Yes. 11 Q. I just want to look at Strategic Vision 12 175. 13 MR. SCHMIDT: You have to look at the 14 lower right-hand corner. 15 A. Okay. 16 Q. It looks like there was a Post-it note 17 on this document. Do you see that? 18 A. Yes. 19 Q. Whose handwriting is on that Post-it 20 note? 21 A. It looks like French Wallop's 22 handwriting. 23 Q. That's not your handwriting? 24 A. No. I have not seen this before. I 25 have not seen the Post-it note before.</p>

EASTERN PROFIT CORPORATION LIMITED vs STRATEGIC VISION US, LLC  
J. Michael Waller on 02/08/2019

<p>Page 190</p> <p>1 Q. If you flip through the document, it 2 looks like there's handwritten notes kind of 3 interspersed throughout it? 4 A. Yes. 5 Q. And maybe items that are circled? 6 A. Yes. 7 Q. You didn't do any of those markings or 8 notes? 9 A. No, I have not seen this before. 10 Q. Let's look at 177. Again, it looks 11 like there was a Post-it note or something 12 affixed on top of the document before it was 13 photocopied. Do you see that? 14 A. Yes. 15 Q. Again, whose handwriting is that? 16 A. It looks like French Wallop's 17 handwriting. 18 Q. Did French tell you that she printed 19 out a copy of the list of fish and kind of put 20 notes and comments on it? 21 A. Yes, yes. 22 Q. She told you she did that or that's 23 what you think happened, I just want to be clear? 24 A. I did it. I printed them out 25 physically, one for her and one for me to work</p>	<p>Page 192</p> <p>1 times that we met in person. The last time we 2 met it wasn't so trusting. 3 Q. Cordial? 4 A. But at the end, he gave me a huge hug 5 and said, "Let's work to trust each other." 6 Q. So going back to your updates with the 7 leader of team 1. What was the information you 8 got after the first update meeting with the 9 leader of team 1? 10 A. So that was on a USB thumb drive, and 11 it consisted of files for most, if not all, of 12 the 15, quote, "fish." It was the basic data 13 that the research team was using to orient 14 themselves to understand who they were 15 researching and some very preliminary 16 information. 17 Q. Where was that meeting? Where did that 18 take place, if you recall? 19 A. I think it was Arlington, Virginia. 20 Q. So the team leader had flown back after 21 going to Europe to update you on the research? 22 A. Yes. 23 Q. Was there any indication there was a 24 problem after that first meeting in terms of 25 getting the research done?</p>
<p>Page 191</p> <p>1 from. 2 Q. I see. Did you mark up and make 3 comments and notes on another version of this 4 document? 5 A. No. 6 Q. What did you do with your copy of it? 7 A. I retained it. 8 Q. You gave an electronic copy to team 9 leader 1? 10 A. Yes. 11 Q. And the folks at ASOG eventually? 12 A. Yes. 13 Q. Did you ever tell Mr. Guo that you like 14 him and trust him and think his work is great? 15 A. I told him I liked him and I admired 16 his work. 17 Q. When was that? 18 A. I said – we both said, let's build a 19 relationship of trust. Neither one of us said we 20 trusted each other. 21 Q. When was that discussion? 22 A. I think it was the first time we met. 23 It was each time we met, actually. Well, no, it 24 was not because he – it was the first time we 25 met. Words to that effect were said each of the</p>	<p>Page 193</p> <p>1 A. No. 2 Q. Was there ever that internal 3 miscommunication that delayed the progress of the 4 investigation? 5 MR. SCHMIDT: Objection. You can go 6 ahead. 7 A. There were several. 8 Q. Let me break it down. Was there ever 9 miscommunication between you and the leader of 10 team 1? 11 A. No. 12 Q. Was there ever a miscommunication 13 between you and French Wallop? 14 MR. SCHMIDT: Objection. 15 A. No, not that I can think of, no, no. 16 Q. What did you do with the information 17 you received from the first – let's call it – 18 follow-up meeting with the leader of team 1? You 19 said you received a USB? 20 A. Right, and we delivered it to Guo. 21 Q. When was that delivery? 22 A. Within a day or two of getting it, in 23 early January, mid-January. 24 Q. Who did the delivery? 25 A. The team 1 leader brought it to me, and</p>

EASTERN PROFIT CORPORATION LIMITED vs STRATEGIC VISION US, LLC  
J. Michael Waller on 02/08/2019

<p style="text-align: right;">Page 194</p> <p>1 then if memory serves, I gave it to French, and I 2 don't remember whether I physically, I or French 3 physically gave it to Yvette. 4 Q. So you don't know if the information 5 you received from the leader of team 1 in, as you 6 described it, early to mid-January was ever 7 actually conveyed to Yvette? 8 A. Oh, yes, I did. 9 Q. How do you know? 10 A. Because Yvette came back and said, 11 "It's junk," and Guo actually complained about it 12 in person when we met him. 13 Q. Between the execution of the contract 14 and when you were told that this information was 15 junk, how many meetings did you have with the 16 leader of team 1? 17 A. It depends on when Guo said, "It's 18 junk," because he or Yvette said that 19 successively. 20 Q. How about January 30th? Between 21 January 6th and January 30, 2018, how many times 22 did you meet with the leader of team 1? 23 A. Two or three. 24 Q. Did you receive a USB drive from the 25 leader of team 1 at each of those meetings?</p>	<p style="text-align: right;">Page 196</p> <p>1 That was the purpose of the progress reports. 2 Q. Do you think that Mr. Guo, Yvette, and 3 Lianchao had a misunderstanding about how easy it 4 would be to access the research information? 5 MR. SCHMIDT: Objection. You can 6 answer. 7 A. I think in retrospect, Guo thought we 8 could simply pay off some crooked intelligence 9 officers here and get illegally obtained 10 information. 11 Q. Why would he think that? Why do you 12 think he thinks that? 13 A. Because that's how you do it in China. 14 Second, it's physically impossible to – even for 15 the NSA to dig out this information in the short 16 timeframe that Guo ended up seeking to expect. 17 It's mathematically impossible. 18 MS. TESKE: Can we take a short break? 19 MR. GRENDI: Let's take one. 20 THE VIDEOGRAPHER: Off the record at 21 3:06. 22 (Whereupon, a short recess was taken.) 23 THE VIDEOGRAPHER: We are now back on 24 the record at 3:16. 25 Q. Did Strategic Vision ever deliver any</p>
<p style="text-align: right;">Page 195</p> <p>1 A. Yes. 2 Q. So each time you met with him, you got 3 a USB? 4 A. I got two drives from those two or 5 three meetings. 6 Q. Okay. Did the leader of team 1 tell 7 you there was any problem conducting the 8 research? 9 A. No problems that were not standard. 10 Meaning you have – it takes time to get into a 11 system and a minimum of six days for certain 12 procedures. And we had told Guo this in the 13 beginning with the screenshot of that CITIC 14 server document. 15 Q. So to your mind, this was a standard 16 investigation that was going as planned? 17 A. Yes. 18 Q. Did you ever tell Eastern or Mr. Guo or 19 Yvette that there were problems with the 20 investigation? 21 A. No. Challenges, but not problems. 22 Q. What were the challenges? 23 A. To explain to them why it takes so long 24 to get the data that they're requesting. It 25 can't be turned around in days or even weeks.</p>	<p style="text-align: right;">Page 197</p> <p>1 reports under the agreement? 2 A. Yes. 3 Q. When was that? 4 A. Every time we delivered a USB drive and 5 several times verbally. 6 Q. Why don't you tell me about the times 7 that you believe you delivered a report to 8 Eastern? 9 MR. SCHMIDT: Objection. 10 Q. Let me put it this way. Please tell me 11 about the first time you were present when a 12 report was delivered. 13 A. I delivered them myself. 14 Q. All the reports? 15 A. Yes. 16 Q. Okay. When was the first report that 17 you delivered? 18 A. The first were verbal progress reports 19 about the nature of the setup of the work, 20 immediately following signing of the contract. 21 Q. So the first one, who did you convey 22 the report to? 23 A. To – that would have been to Yvette. 24 Q. What was the date of that? 25 A. I don't recall the date.</p>

EASTERN PROFIT CORPORATION LIMITED vs STRATEGIC VISION US, LLC  
J. Michael Waller on 02/08/2019

<p style="text-align: right;">Page 198</p> <p>1 Q. Roughly speaking?</p> <p>2 A. It was – I don't recall the date. It</p> <p>3 was simply a status report on the progress, and</p> <p>4 they were verbal.</p> <p>5 Q. Who else was present?</p> <p>6 A. French would have been present.</p> <p>7 Q. Anyone else?</p> <p>8 A. Not that I recall.</p> <p>9 Q. So it was you, French and Yvette –</p> <p>10 A. As I recall.</p> <p>11 Q. – had a discussion that you think was</p> <p>12 the first report?</p> <p>13 A. I know it was the first report.</p> <p>14 Q. Where did that occur?</p> <p>15 A. I don't remember. It was – I don't</p> <p>16 recall.</p> <p>17 Q. What information was conveyed to</p> <p>18 Yvette?</p> <p>19 A. The status of setting up team 1.</p> <p>20 Q. Anything else?</p> <p>21 A. No.</p> <p>22 Q. So it would have been after, let's say,</p> <p>23 January 9th or 10th?</p> <p>24 A. Yeah, I would say the week, within that</p> <p>25 week.</p>	<p style="text-align: right;">Page 200</p> <p>1 asking what you did or didn't do, that's all.</p> <p>2 What about the second time you</p> <p>3 delivered a report? When was that?</p> <p>4 A. It was within, within a week of the</p> <p>5 first one, approximately, and it was a very small</p> <p>6 amount.</p> <p>7 Q. What, of data?</p> <p>8 A. Of data, yes. So the verbal ones, and</p> <p>9 there's constant verbal communication, but the</p> <p>10 first report on a USB drive was roughly around</p> <p>11 the 22nd, roughly.</p> <p>12 Q. I just want to break down what you mean</p> <p>13 by "verbal." Does a Signal message constitute in</p> <p>14 your mind like a verbal report or do you mean</p> <p>15 literally face-to-face?</p> <p>16 A. Face-to-face. If it's done verbally on</p> <p>17 Signal, that would count. If it's simply how is</p> <p>18 progress doing, here's what we're doing now.</p> <p>19 This is the status report.</p> <p>20 MR. SCHMIDT: When you say "verbal,"</p> <p>21 you mean an oral conversation as opposed to</p> <p>22 a written or an electronic communication –</p> <p>23 A. That's correct.</p> <p>24 Q. – right?</p> <p>25 Were any of the reports a written</p>
<p style="text-align: right;">Page 199</p> <p>1 Q. Is there a date you could think of that</p> <p>2 it was definitely before, had to have been before</p> <p>3 X date?</p> <p>4 A. I can't give you a reasonable date. It</p> <p>5 was before – well, no. It was within a week of</p> <p>6 signing the contract.</p> <p>7 Q. Was it in New York perhaps?</p> <p>8 A. I would have to check my travel</p> <p>9 records. I don't know where it was. Or it could</p> <p>10 have been simply – I don't know. I don't want</p> <p>11 to say what it could have been. I don't recall</p> <p>12 the exact time.</p> <p>13 Q. Do you keep detailed travel records?</p> <p>14 A. Not detailed ones.</p> <p>15 Q. Do you keep travel records?</p> <p>16 A. Sometimes.</p> <p>17 Q. Like the flights that you take or maybe</p> <p>18 when you take a train?</p> <p>19 A. Or sometimes I travel in ways that are</p> <p>20 not traceable. Remember, this is a contract.</p> <p>21 Q. Such as?</p> <p>22 A. You're trying to avoid the Chinese</p> <p>23 intelligence service, so you're not going to keep</p> <p>24 lawyerly notes of everything.</p> <p>25 Q. I wasn't expecting you to. I'm just</p>	<p style="text-align: right;">Page 201</p> <p>1 Signal message?</p> <p>2 A. I don't recall.</p> <p>3 Q. But in your mind, it's possible that</p> <p>4 you could have conveyed a status report via a</p> <p>5 Signal message?</p> <p>6 A. It's possible.</p> <p>7 Q. But you don't recall if you did or</p> <p>8 didn't do that?</p> <p>9 A. No.</p> <p>10 Q. I want to talk to you about a meeting</p> <p>11 that I think occurred on January 26, 2018. Did</p> <p>12 there come a time when you met with French,</p> <p>13 Yvette, and Mr. Guo at the Pierre on or about</p> <p>14 January 26th?</p> <p>15 A. At the Pierre.</p> <p>16 Q. I believe it's a hotel or apartment</p> <p>17 complex.</p> <p>18 A. It was at Netherland's, something</p> <p>19 Netherland's.</p> <p>20 Q. Sherry-Netherlands?</p> <p>21 A. Sherry-Netherlands. That's where he</p> <p>22 lived. We met once in the first floor</p> <p>23 restaurant. That might have been the Pierre. I</p> <p>24 don't know if that's the name of it.</p> <p>25 Q. But you do recall a meeting on or about</p>



EASTERN PROFIT CORPORATION LIMITED vs STRATEGIC VISION US, LLC  
J. Michael Waller on 02/08/2019

<p style="text-align: right;">Page 202</p> <p>1 January 26th?</p> <p>2 A. Yes.</p> <p>3 Q. Is that when you delivered this first</p> <p>4 bit of USB data?</p> <p>5 A. Yes, I think.</p> <p>6 Q. Okay. What was on that USB drive?</p> <p>7 A. It consisted of files containing most,</p> <p>8 if not all, of the 15 main, quote, "fish," and</p> <p>9 then some of the work, the demonstration of the</p> <p>10 work that the researchers did so that they could</p> <p>11 understand their targets, and then some very</p> <p>12 basic interim electronic files that were attached</p> <p>13 to them, that were attached to some of them.</p> <p>14 Q. Did you present the information on a</p> <p>15 laptop or did you just hand over the disk and</p> <p>16 say, here you go?</p> <p>17 A. I handed it over to him – I think at</p> <p>18 that point, I just handed it to him.</p> <p>19 Q. So there was no discussion about what</p> <p>20 was actually there by looking at the data?</p> <p>21 A. Yes. I said I informed in advance, and</p> <p>22 then I explained it to Guo personally.</p> <p>23 Q. Was there ever a meeting where you</p> <p>24 plugged a USB drive into a laptop to show Mr. Guo</p> <p>25 or Yvette what research was being conducted?</p>	<p style="text-align: right;">Page 204</p> <p>1 Q. You recall eating a meal at that</p> <p>2 meeting, though?</p> <p>3 A. Yes.</p> <p>4 Q. You said you met for about three hours?</p> <p>5 A. For a few hours.</p> <p>6 Q. A few hours, I'm sorry.</p> <p>7 What was discussed?</p> <p>8 A. The –</p> <p>9 Q. I'm talking about the January 26, 2018</p> <p>10 meeting.</p> <p>11 A. The nature of the information. He</p> <p>12 thought about it, then he got very upset when he</p> <p>13 wasn't getting the quantity of information that</p> <p>14 he wanted. We explained to him again the</p> <p>15 technology, the way we were – the technical</p> <p>16 means. He didn't want to hear it. He just said,</p> <p>17 "I want it. I want it now."</p> <p>18 Q. Do you recall Mr. Guo perhaps sitting</p> <p>19 on a desk during this meeting or anything about</p> <p>20 just the way the parties were situated as they</p> <p>21 were discussing it?</p> <p>22 A. This was in his residence. We would</p> <p>23 sit in the living room. He had his own chair,</p> <p>24 and then we talked in the dining room over lunch.</p> <p>25 Q. When did he express what you described</p>
<p style="text-align: right;">Page 203</p> <p>1 A. The one I recall was at Penn Station at</p> <p>2 a restaurant there on or around January 30th to</p> <p>3 Yvette and a male companion of hers.</p> <p>4 Q. That's the only time you can remember</p> <p>5 presenting information to Mr. Guo or Yvette on a</p> <p>6 computer?</p> <p>7 A. That's the only one I recall because</p> <p>8 he's very strict about computers in his</p> <p>9 residence.</p> <p>10 Q. So going back to the meeting you were</p> <p>11 just talking about. On January 26, 2018, you</p> <p>12 just kind of handed over a USB drive?</p> <p>13 A. I believe so.</p> <p>14 Q. Did Mr. Guo or Yvette put that into a</p> <p>15 computer and look at it then?</p> <p>16 A. Actually, that was the one time when –</p> <p>17 let me remember. I'm not sure.</p> <p>18 Q. So you don't know if they reviewed the</p> <p>19 data right then and there or if you guys left</p> <p>20 after just handing over the disk?</p> <p>21 A. No, we stayed and we spent a few hours</p> <p>22 with him.</p> <p>23 Q. Did you eat Chinese food at that</p> <p>24 meeting?</p> <p>25 A. We always ate Chinese food with him.</p>	<p style="text-align: right;">Page 205</p> <p>1 as disappointment and frustration?</p> <p>2 A. At that – at that – after being told</p> <p>3 what was there. And then he was quiet, and he</p> <p>4 was very cordial, and then he exploded.</p> <p>5 Q. And what did he say when he, as you put</p> <p>6 it, "he exploded"?</p> <p>7 A. He was attacking the integrity of the</p> <p>8 project, questioning our motives, saying that</p> <p>9 "This is all junk. This is all garbage." Then</p> <p>10 he left the room, stomped around the house a</p> <p>11 while, and then came back, and then sort of</p> <p>12 stared me down. Then I apologized to him for not</p> <p>13 being able to produce the results, but this is</p> <p>14 the way we did it. This is the way we agreed to</p> <p>15 do it, and this is the speed that I told you with</p> <p>16 which we were going to get these results. He was</p> <p>17 still very angry, but he calmed down.</p> <p>18 Q. Did he explain to you –</p> <p>19 A. It was at that time –</p> <p>20 Q. Go ahead.</p> <p>21 A. No, please.</p> <p>22 Q. Did he explain to you why he wanted</p> <p>23 information so promptly?</p> <p>24 A. No.</p> <p>25 Q. Did you ever come to understand why</p>

**EASTERN PROFIT CORPORATION LIMITED vs STRATEGIC VISION US, LLC**  
**J. Michael Waller on 02/08/2019**

<p style="text-align: right;">Page 206</p> <p>1 there was a need for information promptly?</p> <p>2 A. No, because he would alternate between</p> <p>3 saying he wanted this for a long-term political</p> <p>4 attack and then he wanted it now. We could never</p> <p>5 reconcile that.</p> <p>6 Q. So after this confrontation, what</p> <p>7 happened next during this meeting?</p> <p>8 A. During this meeting he was very</p> <p>9 agitated, and after he calmed down, that's when</p> <p>10 he saw us to his door, to the elevator and gave</p> <p>11 me a big hug and said, "Let's just work this out</p> <p>12 and work on it. Let's work to trust each other."</p> <p>13 Q. Did you promise to deliver any</p> <p>14 information subsequent to that meeting to placate</p> <p>15 or otherwise please?</p> <p>16 A. Yes. Well, first at that meeting, I</p> <p>17 said, "Look, I know you're upset. Why don't we</p> <p>18 just write off the first two months of this and</p> <p>19 have the contract start effectively on the 15th</p> <p>20 of January? That way, you don't" –</p> <p>21 MR. SCHMIDT: – two –</p> <p>22 MR. GRENDI: Excuse me. Don't</p> <p>23 interrupt the witness during the middle of</p> <p>24 testimony.</p> <p>25 A. So we essentially moved the start date</p>	<p style="text-align: right;">Page 208</p> <p>1 A. Words to that effect.</p> <p>2 Q. And Lianchao wasn't at that meeting,</p> <p>3 right?</p> <p>4 A. No, just Yvette and French Wallop.</p> <p>5 Q. Do you know why Lianchao wasn't there?</p> <p>6 A. No.</p> <p>7 Q. Before you were saying that – sorry.</p> <p>8 Before you were saying you agreed to give him</p> <p>9 data after this January 26th meeting?</p> <p>10 I'm sorry, you have to answer verbally.</p> <p>11 A. I thought you were continuing the</p> <p>12 question.</p> <p>13 Q. You were shaking your head, so I was</p> <p>14 confused.</p> <p>15 A. Oh, it was sort of like go ahead. So</p> <p>16 what was the question?</p> <p>17 Q. The question is did you promise to give</p> <p>18 Mr. Guo Eastern information after this</p> <p>19 January 26, 2018 meeting?</p> <p>20 A. Yes.</p> <p>21 Q. What did you promise to give him?</p> <p>22 A. The next tranche of electronic</p> <p>23 information via USB drive from team 1.</p> <p>24 Q. And did you understand that you were</p> <p>25 going to give that information on kind of an</p>
<p style="text-align: right;">Page 207</p> <p>1 to the 15th of January so that he wouldn't be</p> <p>2 paying for the first two weeks. He was satisfied</p> <p>3 with that and grateful for it.</p> <p>4 Q. Why was it that you offered to give the</p> <p>5 first two weeks for free?</p> <p>6 A. Because he was very agitated, and he</p> <p>7 thought he was getting – he was very agitated</p> <p>8 and very angry, and he's a brand-new client that</p> <p>9 we want to keep. So you eat part of the cost to</p> <p>10 keep the client.</p> <p>11 Q. So in your mind there wasn't any</p> <p>12 problem with the start of the research or getting</p> <p>13 it going that required you to write off two</p> <p>14 weeks?</p> <p>15 A. No, there was no problem.</p> <p>16 Q. But the reason that you're saying is</p> <p>17 that you wrote off that time is because the</p> <p>18 client was upset?</p> <p>19 A. Yes.</p> <p>20 Q. Did he accept that offer?</p> <p>21 A. Yes.</p> <p>22 Q. He said, Okay. All's well. As long as</p> <p>23 I get two weeks free, fine?</p> <p>24 A. Yes.</p> <p>25 Q. He said those words?</p>	<p style="text-align: right;">Page 209</p> <p>1 accelerated basis?</p> <p>2 A. Yes.</p> <p>3 Q. Why is that?</p> <p>4 A. Because he was so impatient.</p> <p>5 Q. What did you tell him that information</p> <p>6 would contain?</p> <p>7 A. I said, "It's not going to have a lot</p> <p>8 of new material because it's still just starting</p> <p>9 out." He said, "I don't care. I just want</p> <p>10 whatever they have."</p> <p>11 Q. Why did you apologize to Mr. Guo at</p> <p>12 this meeting?</p> <p>13 A. There is the Asian tradition of losing</p> <p>14 face, and I didn't want him to feel like he was</p> <p>15 losing face when I continued to tell him that his</p> <p>16 demands were not possible, as we had already</p> <p>17 discussed.</p> <p>18 Q. So you were just trying to placate him?</p> <p>19 A. Placate the client.</p> <p>20 Q. But you weren't actually sorry about</p> <p>21 anything?</p> <p>22 A. I was sorry that he was disappointed,</p> <p>23 yes. I did not apologize for the work or the</p> <p>24 quality of the work or the delays. I apologized</p> <p>25 for the fact that he was disappointed.</p>

EASTERN PROFIT CORPORATION LIMITED vs STRATEGIC VISION US, LLC  
J. Michael Waller on 02/08/2019

<p style="text-align: right;">Page 210</p> <p>1 Q. I understand. Did you tell them that 2 you were going to fly to Europe to get the next 3 tranche of information? 4 A. Yes. 5 Q. And did you? 6 A. Yes. 7 Q. When was that? 8 A. Within a couple of days. I think it 9 was the 29th. 10 Q. That you flew to Europe? 11 A. Yes. 12 Q. And then did you fly right back? 13 A. Yes, the same day. 14 Q. What country was that? 15 A. I went to Ireland first, and then while 16 in Ireland, I booked a flight to Germany just so 17 that I would not have a preexisting flight to 18 Germany, to Frankfurt. I met the contact in 19 Frankfurt. 20 Q. Oh, I see. So you flew to Ireland, and 21 then you booked a flight to Germany to meet the 22 leader of team 1? 23 A. Yes. 24 Q. That travel plan that you just 25 described is to avoid people knowing your</p>	<p style="text-align: right;">Page 212</p> <p>1 A. I came in from Newark Airport by rail 2 to Penn Station, met her at that restaurant with 3 her male companion. She and I sat next to each 4 other. I used a virgin computer, meaning one 5 that had never been on the internet or had never 6 been used for anything besides my drives, and 7 scrolled through the information with her on the 8 screen. 9 Q. This was in like the booth of the 10 restaurant? 11 A. Yes. 12 Q. What did you explain to her as you were 13 doing that? 14 A. I said, "This is just as we reported. 15 There are 16 useful lines of code in here." 16 MR. GRENDI: Let's do Exhibit 7. 17 (Waller Exhibit 7, Background Report on 18 Qing Yao, marked for identification.) 19 Q. Just looking at the first page, do you 20 recognize this document? 21 A. No. 22 Q. Do you know whether or not this 23 information was in the 80 gigabytes of data? 24 A. No. 25 Q. And you never reviewed this report?</p>
<p style="text-align: right;">Page 211</p> <p>1 itinerary? 2 A. Right. 3 Q. So then you met the leader of team 1 in 4 Germany on or about the 29th? 5 A. I think it was the 30th. 6 Q. Then you flew right back to the 7 United States? 8 A. Yes. 9 Q. What did you do next? 10 A. Then I delivered the material to Yvette 11 at Penn Station. 12 Q. Was that at Tracks Bar? 13 A. Sounds right. 14 Q. That was about 80 gigabytes of data or 15 thereabouts? 16 A. Yes. 17 Q. Did you even have a chance to review 18 that information? 19 A. It was code. I was told in advance 20 what it was. Team 1 said it's only 80 gigs of 21 data of which 16 lines of code are important. I 22 told this to Yvette before traveling. She said, 23 "I don't care. Bring it back anyway." 24 Q. Just describe the meeting where you 25 handed the 80 gigabytes of data to Yvette.</p>	<p style="text-align: right;">Page 213</p> <p>1 A. I'm not familiar with this report. You 2 just said, "Look at the first page." 3 Q. If you want to take a look through for 4 more to see if you know it, go ahead. 5 A. I don't recognize this document. 6 Q. So you don't know who created it? 7 A. No. 8 Q. Going back to that 80-gigabyte drive. 9 Did you on your flight back have a chance to 10 review it or look at any of the data? 11 A. No. 12 Q. Is that because you didn't have a 13 laptop with you? 14 A. You don't – computers on planes are 15 not secure. 16 Q. And you didn't have any time in Germany 17 before your flight home to look at the data? 18 A. No. The team 1 leader explained to me 19 what the data contained. If it's 80 gigabytes of 20 code and only 16 lines are useful, you only need 21 to know what's on those 16 lines. Those 16 lines 22 were the email addresses and encrypted passwords 23 of several people on Guo's target list. 24 Q. So the team had been able to obtain the 25 email address and passwords for some of the</p>

EASTERN PROFIT CORPORATION LIMITED vs STRATEGIC VISION US, LLC  
J. Michael Waller on 02/08/2019

<p style="text-align: right;">Page 214</p> <p>1 members or some of the individuals listed in the</p> <p>2 Exhibit 6?</p> <p>3 A. Yes. The encrypted passwords, not the</p> <p>4 passwords themselves.</p> <p>5 Q. What is the difference?</p> <p>6 A. It shows – the encrypted password</p> <p>7 shows the characters that aren't the characters</p> <p>8 of the password. So it's so-and-so@yahoo.com and</p> <p>9 then a series of characters that are the</p> <p>10 encrypted password.</p> <p>11 Q. What use is that information from an</p> <p>12 investigation perspective?</p> <p>13 A. It gives you the email address and the</p> <p>14 fact that there is a password that's decryptable.</p> <p>15 It's within the code. It's just a question of</p> <p>16 mathematically decrypting it.</p> <p>17 Q. I see. So the information provided</p> <p>18 could show that there is a path to getting the</p> <p>19 password of the individual fish?</p> <p>20 A. Yes.</p> <p>21 Q. And that through that, other</p> <p>22 information could come?</p> <p>23 A. Yes.</p> <p>24 MR. GRENDI: Let's do 8.</p> <p>25 (Waller Exhibit 8, Letter dated</p>	<p style="text-align: right;">Page 216</p> <p>1 A. Because we were working with Lianchao</p> <p>2 to execute the contract and had not been in</p> <p>3 contact at all with Yvette since February 1st</p> <p>4 when she told us not to communicate with her, but</p> <p>5 to communicate only with Lianchao. So we had no</p> <p>6 idea that anything representing a lawsuit was</p> <p>7 ever under consideration.</p> <p>8 Q. After you started communicating</p> <p>9 exclusively with Lianchao about this contract,</p> <p>10 what other reports did you deliver?</p> <p>11 A. There was a third electronic thumb</p> <p>12 drive and then verbal communication with</p> <p>13 Lianchao. By this time, Lianchao was saying that</p> <p>14 Guo was very dissatisfied and for us to not</p> <p>15 worry. He's working on it.</p> <p>16 Q. I just want to understand the last</p> <p>17 thing you said there. Not to worry and you're</p> <p>18 working on it, who are you talking about there?</p> <p>19 A. Lianchao said, "Guo is dissatisfied,</p> <p>20 but no worries. I'm working with him on it." I,</p> <p>21 Lianchao, am working with Guo on it.</p> <p>22 Q. What did the third USB drive that you</p> <p>23 delivered contain?</p> <p>24 A. It contained more data, more extensive</p> <p>25 data.</p>
<p style="text-align: right;">Page 215</p> <p>1 February 23, 2018, marked for</p> <p>2 identification.)</p> <p>3 Q. Mr. Waller, do you recognize this</p> <p>4 letter?</p> <p>5 A. Yes.</p> <p>6 Q. Just going back to the 80-gigabyte</p> <p>7 drive we were talking about earlier. Did you</p> <p>8 give that information to Ms. Wallop before giving</p> <p>9 it to Mrs. Wang?</p> <p>10 A. No.</p> <p>11 Q. So she never saw that information on</p> <p>12 January 29th or January 30th?</p> <p>13 A. No.</p> <p>14 Q. Did there come a time when you reviewed</p> <p>15 that information with Ms. Wallop?</p> <p>16 A. No.</p> <p>17 Q. Just turning back to 8 here. When did</p> <p>18 you first see this letter?</p> <p>19 A. On February 23, 2018.</p> <p>20 Q. How did you get it?</p> <p>21 A. I got it in a Signal text message from</p> <p>22 Yvette.</p> <p>23 Q. Were you surprised by this letter?</p> <p>24 A. Yes.</p> <p>25 Q. Why is that?</p>	<p style="text-align: right;">Page 217</p> <p>1 Q. How did you deliver that?</p> <p>2 A. By hand.</p> <p>3 Q. To whom?</p> <p>4 A. To Lianchao.</p> <p>5 Q. Did you ever discuss that third</p> <p>6 delivery with Mr. Guo or anyone from Eastern?</p> <p>7 A. No, because Lianchao was Guo's agent</p> <p>8 and our sole interlocutor.</p> <p>9 Q. At that time?</p> <p>10 A. Right. Varying back and forth with</p> <p>11 Yvette. But per Yvette's February 1st</p> <p>12 instruction she said New York – or whatever</p> <p>13 euphemism she used – now wants you to talk only</p> <p>14 to a euphemism for Lianchao. That's in the</p> <p>15 February 1st Signal communication.</p> <p>16 Q. So what was the response to this third</p> <p>17 delivery you're describing?</p> <p>18 A. He just accepted it and said he would</p> <p>19 relay it.</p> <p>20 Q. Did you get any feedback?</p> <p>21 A. No.</p> <p>22 Q. About when was that?</p> <p>23 A. I'm guessing roughly February 10th.</p> <p>24 Q. Were there any reports that you</p> <p>25 delivered after February 10th?</p>

**EASTERN PROFIT CORPORATION LIMITED vs STRATEGIC VISION US, LLC**  
**J. Michael Waller on 02/08/2019**

<p style="text-align: right;">Page 218</p> <p>1 A. No.</p> <p>2 Q. When did team 1 –</p> <p>3 A. Pardon. Correction. No USB reports.</p> <p>4 We had team 2 reports that we did provide after</p> <p>5 February 10th.</p> <p>6 Q. Who were those provided to?</p> <p>7 A. They were provided to French Wallop and</p> <p>8 me, and then we provided them to Lianchao.</p> <p>9 Q. What were the dates of those reports?</p> <p>10 A. Roughly within a few days after</p> <p>11 February 10th.</p> <p>12 Q. These weren't USBs, he said, or they</p> <p>13 were? I'm sorry, I'm not clear.</p> <p>14 A. They were verbal because this was when</p> <p>15 ASOG said we can't, we can't provide this</p> <p>16 information because these are all restricted or</p> <p>17 records-protected persons.</p> <p>18 Q. Was Mr. Guo present for you conveying</p> <p>19 that information?</p> <p>20 A. No.</p> <p>21 Q. You just told it to Lianchao?</p> <p>22 A. Yes.</p> <p>23 Q. Was that via a Signal message or just</p> <p>24 verbally?</p> <p>25 A. That was probably just verbally. If</p>	<p style="text-align: right;">Page 220</p> <p>1 Q. How much did you pay to ASOG or did</p> <p>2 Strategic Vision pay to ASOG?</p> <p>3 A. I believe \$5,000.</p> <p>4 Q. So team 2, the all-in cost was \$5,000?</p> <p>5 A. The final – it was budgeted at</p> <p>6 111,000. They did not provide the information</p> <p>7 because it was a crime, so they severed the</p> <p>8 relationship with us.</p> <p>9 Q. I see. When did they sever that</p> <p>10 relationship?</p> <p>11 A. Around mid-February.</p> <p>12 Q. What about team 1?</p> <p>13 A. Team 1, when it was clear that there</p> <p>14 was not going to be a payment coming from Guo, I</p> <p>15 told them that I would appreciate them to work on</p> <p>16 spec for those who would, but I warned them that</p> <p>17 there may be a long delay in paying. So parts of</p> <p>18 team 1 continued working.</p> <p>19 Q. Did there ever come a time when you</p> <p>20 heard that members of team 1 quit?</p> <p>21 A. Yes, they wanted to quit.</p> <p>22 Q. I just want to be precise, though. Did</p> <p>23 you ever hear that members of team 1 quit?</p> <p>24 A. I believe two quit. The whole team</p> <p>25 wanted to quit.</p>
<p style="text-align: right;">Page 219</p> <p>1 it's a Signal message, it would be in that chain.</p> <p>2 Q. So you didn't delete any Signal</p> <p>3 messages between you and Lianchao?</p> <p>4 A. I don't believe so.</p> <p>5 Q. When did you instruct team 1 and team 2</p> <p>6 to stop working?</p> <p>7 A. Team 2 would not work for us.</p> <p>8 Q. When was that?</p> <p>9 A. That was when they gave us the</p> <p>10 information about the RPs. Now, they did provide</p> <p>11 us other information which we relayed concerning</p> <p>12 flights, travel of some of the individuals</p> <p>13 involved, aircraft tail numbers, other personal</p> <p>14 data which they showed visually and conveyed</p> <p>15 verbally but did not physically give us.</p> <p>16 They did provide a few pages of</p> <p>17 information but not much. They had a large file.</p> <p>18 They presented us with a bill for \$111,000 for</p> <p>19 one week's research. I said, "Well, if you're</p> <p>20 not going to do the research, we're not going to</p> <p>21 pay that bill if you're not going to hand over</p> <p>22 the research." So we paid them a very small</p> <p>23 severance per their instruction that they did not</p> <p>24 want to work with us. They immediately suspected</p> <p>25 that Guo was the client.</p>	<p style="text-align: right;">Page 221</p> <p>1 Q. I see.</p> <p>2 A. And then team 2 quit.</p> <p>3 Q. When did you find out that two members</p> <p>4 of team 1 quit?</p> <p>5 A. Early on sometime in January.</p> <p>6 Q. I see.</p> <p>7 A. Sometime in the last two weeks of</p> <p>8 January.</p> <p>9 Q. I take it the leader of team 1 told you</p> <p>10 that information?</p> <p>11 A. Yes.</p> <p>12 Q. Did he tell you why they quit?</p> <p>13 A. Yes.</p> <p>14 Q. What was that?</p> <p>15 A. They thought that Miles Kwok was up to</p> <p>16 organized criminal activity or was working for</p> <p>17 the Chinese government.</p> <p>18 Q. Did you see any information to support</p> <p>19 that conclusion or hypothesis?</p> <p>20 A. No. That was just what they suspected,</p> <p>21 and that's why they wanted to leave. They also</p> <p>22 complained – the whole team complained that</p> <p>23 Guo's security was deplorable because they could</p> <p>24 see his fingerprints on the data that we provided</p> <p>25 them, because he had put some of it up on his own</p>

EASTERN PROFIT CORPORATION LIMITED vs STRATEGIC VISION US, LLC  
J. Michael Waller on 02/08/2019

<p style="text-align: right;">Page 222</p> <p>1 websites. He'd made it public. And because</p> <p>2 there were other teams out there that were doing</p> <p>3 the same research on the same targets, which they</p> <p>4 suspected was part of his group.</p> <p>5 Q. But they don't have any way -- did they</p> <p>6 have any way of knowing that it was definitely</p> <p>7 Miles's other teams?</p> <p>8 A. No. It's just other people doing the</p> <p>9 same work on the same targets at the same time.</p> <p>10 Team 1 had asked if there were other teams, and I</p> <p>11 said Guo had said that there were three or four</p> <p>12 other teams.</p> <p>13 Q. So just when did team 1 finally stop</p> <p>14 working?</p> <p>15 A. On February 23rd.</p> <p>16 Q. So as soon as you got this letter, you</p> <p>17 told them that's it?</p> <p>18 A. "Stand down."</p> <p>19 Q. How much was paid to team 1?</p> <p>20 A. Between 250 and \$300,000.</p> <p>21 Q. Was that money paid by one of your</p> <p>22 LLCs?</p> <p>23 A. By I believe one of French's LLCs and</p> <p>24 by one or two of my LLCs.</p> <p>25 Q. So you broke up the payments?</p>	<p style="text-align: right;">Page 224</p> <p>1 Q. So you just mean like the travel and</p> <p>2 meals associated that?</p> <p>3 A. No, we'd pay people to investigate. We</p> <p>4 had other people looking. We wanted to verify</p> <p>5 that what team 1 was telling us was true or</p> <p>6 accurate.</p> <p>7 Q. So you had contacts and resources that</p> <p>8 were verifying whether team 1 was doing its job?</p> <p>9 A. Verifying whether the techniques that</p> <p>10 team 1 was using were indeed accurate, after Guo</p> <p>11 was complaining that it was too slow.</p> <p>12 Q. And you were paying those other third</p> <p>13 parties?</p> <p>14 A. Yes.</p> <p>15 Q. How much money were you talking about</p> <p>16 paying to those people essentially verifying</p> <p>17 team 1?</p> <p>18 A. In the low tens of thousands.</p> <p>19 Q. Who were those people?</p> <p>20 A. Anonymous hackers.</p> <p>21 Q. So if they're anonymous, how do you</p> <p>22 know how to pay them?</p> <p>23 A. They set up a way to pay them.</p> <p>24 Q. What is that, like a crypto currency?</p> <p>25 A. Discreet ways of paying without a paper</p>
<p style="text-align: right;">Page 223</p> <p>1 A. Yes.</p> <p>2 Q. And that was to evade detection by the</p> <p>3 Chinese communists?</p> <p>4 A. Yes.</p> <p>5 Q. Are you aware of any other costs that</p> <p>6 were incurred to put together the investigation</p> <p>7 teams?</p> <p>8 A. We incurred our own expenses. We had</p> <p>9 opportunity costs where we were not doing other</p> <p>10 work.</p> <p>11 Q. Let's go one at a time. How much was</p> <p>12 the cost of travel, items of that nature?</p> <p>13 A. Between French and me?</p> <p>14 Q. Yeah.</p> <p>15 A. Probably less than \$50,000.</p> <p>16 Approximately \$50,000.</p> <p>17 Q. Any other hard costs where you actually</p> <p>18 incurred an expense?</p> <p>19 A. Yeah. They were the ordinary expenses</p> <p>20 of running something in the D.C. area, going to</p> <p>21 meetings, talking to people, working through our</p> <p>22 own networks to research, sure.</p> <p>23 Q. Right. But I mean something that was</p> <p>24 actually an out-of-pocket cost?</p> <p>25 A. Yes.</p>	<p style="text-align: right;">Page 225</p> <p>1 trail.</p> <p>2 Q. You're refusing to disclose how you pay</p> <p>3 them?</p> <p>4 A. We paid them in crypto and in cash.</p> <p>5 Q. How much money are we talking about?</p> <p>6 A. Low tens.</p> <p>7 Q. So between 10 and 20?</p> <p>8 A. 10 and 20, 10 and 25.</p> <p>9 Q. How many anonymous hackers did you pay</p> <p>10 that money to?</p> <p>11 A. Two.</p> <p>12 Q. Two. Was one paid more than the other</p> <p>13 or was it about down the line?</p> <p>14 A. I don't recall if one did more work.</p> <p>15 Q. Any other hard costs that were incurred</p> <p>16 in connection with this engagement that you're</p> <p>17 aware of?</p> <p>18 A. Of a major nature?</p> <p>19 Q. Yeah. If it's not material, I don't</p> <p>20 need to know about a meal.</p> <p>21 A. No, I don't believe so.</p> <p>22 Q. I'll just give you a moment to think</p> <p>23 about it, if there's anything else.</p> <p>24 A. I can't think of anything.</p> <p>25 Q. Okay.</p>



EASTERN PROFIT CORPORATION LIMITED vs STRATEGIC VISION US, LLC  
J. Michael Waller on 02/08/2019

<p style="text-align: right;">Page 226</p> <p>1 MR. GRENDI: Let's go to 9. 2 (Waller Exhibit 9, Document Bates 3 stamped SVUS000077, marked for 4 identification.) 5 Q. Do you recognize this document? 6 A. Yes. 7 Q. Looking at that top right-hand corner, 8 there's some handwriting there. Do you see that? 9 A. Yes. 10 Q. Is that your handwriting or someone 11 else's? 12 A. No, it's someone else's. 13 Q. Is it French's handwriting? 14 A. It appears to be. 15 Q. Did you draft this document? 16 A. Yes. 17 Q. Did you draft it alone or did you work 18 with French on it? 19 A. I worked with French and Lianchao. 20 Q. When was the first meeting with Guo? 21 A. I want to say December 9th. I'm not 22 certain. I have the train receipt that would 23 mark that date. 24 Q. Was Bill Gertz at that meeting? 25 A. No.</p>	<p style="text-align: right;">Page 228</p> <p>1 you described it, "totalitarian regime"? 2 A. It's not a Strategic Vision one; it's 3 my own. 4 Q. It's your own? 5 A. -yes. And not a playbook; it was 6 designed custom to present to Guo. 7 Q. So this is based on your analysis and 8 experience? 9 A. Yeah. 10 Q. This document? 11 A. Yes. 12 Q. What was Mrs. French's involvement with 13 creating this document, if any? 14 A. Mrs. Wallop, she was part of the 15 discussions leading up to part of the 16 brainstorming with Lianchao to get the ideas 17 together to draw up this plan. 18 Q. Were these your ideas as to what 19 Mr. Guo should do or did he tell you this is what 20 he wanted to do? 21 A. He didn't tell us anything at that 22 time. It was Lianchao who did. So I combined 23 what he wanted with what I thought would best 24 suit his goals. 25 Q. Did you give the document to Mr. Guo or</p>
<p style="text-align: right;">Page 227</p> <p>1 Q. So who was there? 2 A. It was French, Lianchao, Guo, and 3 myself. 4 Q. Had you prepared this document in 5 advance of that meeting? 6 A. Yes. 7 Q. Where did you get the ideas for this 8 "Vision," as it's titled? 9 A. Through my career of fighting 10 totalitarian dictatorships and helping defectors 11 or others to come up and be a spokesman for the 12 opposition. 13 Q. Why did you think "Mr. G," as it's 14 titled in this document, would be interested in 15 this suite of services? 16 A. This was based on our conversations 17 with Lianchao. 18 Q. I see. So had Lianchao described to 19 you what Mr. Guo was trying to do? 20 A. Yes. 21 Q. Based on those conversations, you 22 created this "Vision" document? 23 A. Yes. 24 Q. Is this sort of a Strategic Vision 25 playbook for waging a campaign to topple a, as</p>	<p style="text-align: right;">Page 229</p> <p>1 Lianchao? 2 A. Yes, to both of them. 3 Q. You handed them a paper document? 4 A. Yes. 5 Q. But Mr. Guo didn't engage with 6 Strategic Vision or you to provide these 7 services, right? 8 A. Not in a contractual way. 9 Q. Let me ask you this. Is there another 10 agreement between Mr. Guo – strike that. 11 Did Strategic Vision and Mr. Guo come 12 to an agreement concerning the services in this 13 document? 14 A. No, he decided just to go with the 15 opposition research. 16 Q. So everything else in here was kind of 17 scrapped? 18 A. Yes. 19 Q. Do you know why Mr. Guo didn't engage 20 with Strategic Vision on these other items? 21 A. No. 22 MR. GRENDI: Let's do 10. 23 (Waller Exhibit 10, Document Bates 24 stamped SVUS80, marked for identification.) 25 Q. Do you recognize this document?</p>

**EASTERN PROFIT CORPORATION LIMITED vs STRATEGIC VISION US, LLC**  
**J. Michael Waller on 02/08/2019**

<p style="text-align: right;">Page 230</p> <p>1 A. Yes.</p> <p>2 Q. This is the first document. It's Bates</p> <p>3 stamped SV80.</p> <p>4 Did you draft this document as well?</p> <p>5 A. Yes.</p> <p>6 Q. What was this document drafted for?</p> <p>7 A. This was a follow onto the previous</p> <p>8 document, Waller 9, after we met with – after</p> <p>9 the first meeting with Guo. So we then took</p> <p>10 what – our takeaways from our discussion with</p> <p>11 him for further ones with Lianchao, and then I</p> <p>12 wrote this three-year timeline to show Guo on our</p> <p>13 second meeting.</p> <p>14 Q. And when was that second meeting?</p> <p>15 A. Mid-December.</p> <p>16 Q. That was, again, with you, French,</p> <p>17 Lianchao and Mr. Guo?</p> <p>18 A. Yes, at his residence.</p> <p>19 Q. In New York?</p> <p>20 A. Yes.</p> <p>21 Q. What was discussed at that meeting?</p> <p>22 A. All of these issues were, including</p> <p>23 everything stated here and a proposal for him to</p> <p>24 get the domain .China, so that he could build a</p> <p>25 global media presence that the Chinese government</p>	<p style="text-align: right;">Page 232</p> <p>1 Q. Do you know who did?</p> <p>2 A. French did to Yvette.</p> <p>3 Q. I see. When was that, if you know?</p> <p>4 A. Late December. I believe it was late</p> <p>5 December. It was obviously subsequent to this</p> <p>6 meeting.</p> <p>7 Q. So this was the first time there was a</p> <p>8 discussion about purchasing a Washington property</p> <p>9 in connection with building this Washington</p> <p>10 presence?</p> <p>11 A. No, that came up at the first meeting.</p> <p>12 This is the takeaway from the first meeting, this</p> <p>13 document 10 and the presentation of the follow-on</p> <p>14 proposal for the second meeting.</p> <p>15 Q. And it has cost estimates, things of</p> <p>16 that nature?</p> <p>17 A. Yes.</p> <p>18 Q. Did you ever give a gift to Mr. Guo?</p> <p>19 A. Maybe a token gift. I don't remember.</p> <p>20 Q. You don't recall trying to give Mr. Guo</p> <p>21 a gift?</p> <p>22 A. No, I don't remember. It was something</p> <p>23 very minor, but I don't recall.</p> <p>24 Q. Do you customarily give gifts to</p> <p>25 clients or potential clients?</p>
<p style="text-align: right;">Page 231</p> <p>1 couldn't interfere with.</p> <p>2 Q. How long was that meeting?</p> <p>3 A. Three or four hours.</p> <p>4 Q. What was the feedback you got from</p> <p>5 this – I take it it was a presentation based on</p> <p>6 this document?</p> <p>7 A. Yes, we discussed this document. Each</p> <p>8 of us had a copy of it. He had a copy of it. We</p> <p>9 discussed the whole thing. He was going along</p> <p>10 with it in English. Then we discussed – what</p> <p>11 came out of this, he wanted to go ahead and</p> <p>12 explore the real estate. He did not engage so</p> <p>13 much on the media part. He was interested in</p> <p>14 buying property.</p> <p>15 Q. Where would that property be?</p> <p>16 A. That was the Evermay mansion in</p> <p>17 Georgetown. That was the property across the</p> <p>18 Treasury Department building in Washington, D.C.</p> <p>19 We talked about him buying the Newseum,</p> <p>20 N-e-w-s-e-u-m building in downtown Washington,</p> <p>21 D.C., and the Rockefeller properties in New York</p> <p>22 City and outside New York.</p> <p>23 Q. Did you participate in showing these</p> <p>24 properties to Mr. Guo?</p> <p>25 A. No.</p>	<p style="text-align: right;">Page 233</p> <p>1 A. It depends on the nature of the client</p> <p>2 or the interest of the client.</p> <p>3 Q. So sometimes?</p> <p>4 A. A bottle of wine or something small</p> <p>5 scale, yeah.</p> <p>6 Q. Okay.</p> <p>7 MR. GRENDI: Let's do 11.</p> <p>8 (Waller Exhibit 11, Document entitled</p> <p>9 "Time to Get Them Beginning the</p> <p>10 Psycho-Political Campaign For China," Bates</p> <p>11 stamped SV385 to SV402, marked for</p> <p>12 identification.)</p> <p>13 MR. GRENDI: I think there's a little</p> <p>14 bit of a copying issue here. We can come</p> <p>15 back to it if we need to. It should be</p> <p>16 SV385 to SV402.</p> <p>17 Q. Mr. Waller, do you recognize this</p> <p>18 document?</p> <p>19 A. Yes.</p> <p>20 Q. What is it?</p> <p>21 A. It is a PowerPoint presentation to Guo</p> <p>22 elaborating on the discussions that we had had</p> <p>23 and showing a game plan that we were recommending</p> <p>24 for him.</p> <p>25 Q. So is this created subsequently to the</p>

EASTERN PROFIT CORPORATION LIMITED vs STRATEGIC VISION US, LLC  
J. Michael Waller on 02/08/2019

<p style="text-align: right;">Page 234</p> <p>1 previous two documents you were just showed?</p> <p>2 A. I believe I created it at the same time</p> <p>3 with this.</p> <p>4 Q. That would be Exhibit 10?</p> <p>5 A. Yes, for the second meeting.</p> <p>6 Q. Did you present it at the second</p> <p>7 meeting on like a computer?</p> <p>8 A. No. He didn't allow computer</p> <p>9 presentations. It was just by hand.</p> <p>10 Q. So you printed this out?</p> <p>11 A. Yes, in a color paper copy.</p> <p>12 Q. So that was at that same second meeting</p> <p>13 you described earlier?</p> <p>14 A. I believe so.</p> <p>15 Q. Turning to 387. It says, "Build and</p> <p>16 operate a secret system for micro-targeted</p> <p>17 intelligence collection and analysis."</p> <p>18 Do you see that?</p> <p>19 A. Yes.</p> <p>20 Q. What does that mean?</p> <p>21 A. That was the project about which this</p> <p>22 whole suit is about.</p> <p>23 Q. That's a description of the research</p> <p>24 that was memorialized in the research agreement?</p> <p>25 A. Yes.</p>	<p style="text-align: right;">Page 236</p> <p>1 A. Yes.</p> <p>2 Q. Is that correct?</p> <p>3 A. Yes.</p> <p>4 Q. Where are you getting that list of 92</p> <p>5 from?</p> <p>6 A. From Exhibit 6.</p> <p>7 Q. Which part of that?</p> <p>8 A. Throughout the entire document you have</p> <p>9 the main person, the numbered individual in large</p> <p>10 letters, and then all the people associated with</p> <p>11 that individual on these trees, and that's a</p> <p>12 total of 92.</p> <p>13 Q. I see. So if you counted up all the</p> <p>14 individuals referenced in Exhibit 6, it's 92?</p> <p>15 A. Yes.</p> <p>16 Q. Exhibit 92 also – excuse me –</p> <p>17 Exhibit 6 also has 15 different named</p> <p>18 individuals, correct?</p> <p>19 A. Yes.</p> <p>20 Q. And under those individuals' names</p> <p>21 there's also the two reports that are requested,</p> <p>22 two or three reports?</p> <p>23 A. Back on Exhibit 6?</p> <p>24 Q. Yes.</p> <p>25 A. Yes.</p>
<p style="text-align: right;">Page 235</p> <p>1 Q. It says, "The first ten targets are</p> <p>2 identified."</p> <p>3 A. Yes.</p> <p>4 Q. What does that mean?</p> <p>5 A. He told us that he had ten targets he</p> <p>6 wanted us to look at, and then gave us the name</p> <p>7 of one to test earlier.</p> <p>8 Q. Who was that?</p> <p>9 A. That was Anita Suen.</p> <p>10 Q. Is that actually a picture of her on</p> <p>11 the right?</p> <p>12 A. Yes.</p> <p>13 Q. And that test, was that test</p> <p>14 demonstration before or after this meeting?</p> <p>15 A. I think it was before.</p> <p>16 Q. I see. With respect to –</p> <p>17 A. Yes. It was before because he provided</p> <p>18 this picture for the presentation that we used.</p> <p>19 Q. What about the other nine targets? Had</p> <p>20 those been identified?</p> <p>21 A. I don't recall. I think he hadn't</p> <p>22 chosen which ones he wanted to prioritize, but I</p> <p>23 don't recall.</p> <p>24 Q. You mentioned before that there were</p> <p>25 like 92 non-prioritized names?</p>	<p style="text-align: right;">Page 237</p> <p>1 Q. Sitting here today, are you telling me</p> <p>2 that you didn't understand that the 15 numbered</p> <p>3 names were the 15 fish being identified?</p> <p>4 A. Yes, but we didn't get this until after</p> <p>5 the contract. Really, this is three weeks before</p> <p>6 we received this.</p> <p>7 Q. Right, but when did you receive a list</p> <p>8 of 92 names?</p> <p>9 A. The day we received Exhibit 6.</p> <p>10 Q. Right, but you're indicating that you</p> <p>11 didn't understand that they were prioritized in</p> <p>12 any way.</p> <p>13 A. No, we understood fully that they were</p> <p>14 prioritized. But he also said you'll also find</p> <p>15 people in here – if you find data on some of</p> <p>16 these other individuals, dig it out and let me</p> <p>17 see it because they might replace one of the 15.</p> <p>18 Q. Right. But in conducting the initial</p> <p>19 research, you understood that the 15 fish were</p> <p>20 the 15 names with numbers next to them on</p> <p>21 Exhibit 6, right?</p> <p>22 A. Yes.</p> <p>23 Q. Going back to Exhibit 11. It says,</p> <p>24 "Document everything as leverage to gain</p> <p>25 concessions, protect people, use as political</p>

EASTERN PROFIT CORPORATION LIMITED vs STRATEGIC VISION US, LLC  
J. Michael Waller on 02/08/2019

<p style="text-align: right;">Page 238</p> <p>1 weapon or as aid in criminal prosecution and</p> <p>2 asset recovery."</p> <p>3 What do you mean by that?</p> <p>4 A. Those were memorializing Guo's – the</p> <p>5 end results that he wanted from this information.</p> <p>6 Q. What did you understand that to be?</p> <p>7 A. He said he had family still in China</p> <p>8 who he wanted to get released. He said he had</p> <p>9 assets still in China that he wanted to – that</p> <p>10 had been confiscated that he wanted to recover,</p> <p>11 and others that he wanted to prevent being</p> <p>12 confiscated.</p> <p>13 Q. It also says "as aid in criminal</p> <p>14 prosecution and asset recovery."</p> <p>15 A. Yes.</p> <p>16 Q. What does that mean in this context?</p> <p>17 A. The asset recovery part, I just</p> <p>18 mentioned.</p> <p>19 Q. Oh, for recovery of his own assets?</p> <p>20 A. Of his own stolen assets.</p> <p>21 Q. I see. Not the assets of others?</p> <p>22 A. No.</p> <p>23 Q. Continue.</p> <p>24 A. And then for criminal prosecution of</p> <p>25 anybody of a criminal nature who is on the list.</p>	<p style="text-align: right;">Page 240</p> <p>1 control, to blackmail people to stay in line.</p> <p>2 His desire was to break that monopoly and get it</p> <p>3 out there so that everybody would know.</p> <p>4 Q. I understand. And it says, "Burrow</p> <p>5 into commercial and political networks for</p> <p>6 business purposes." What does that mean?</p> <p>7 A. Yes. He had some business applications</p> <p>8 that he wanted to use this information for in</p> <p>9 China or Hong Kong.</p> <p>10 Q. Let's go to 388. It says, "Aggressive</p> <p>11 grassroots online social media/activist network</p> <p>12 in the United States, to mobilize key support</p> <p>13 base."</p> <p>14 A. Yes.</p> <p>15 Q. What does that mean?</p> <p>16 A. He had political threats to himself</p> <p>17 through Americans who were tied in with the</p> <p>18 Chinese government, who were putting pressure on</p> <p>19 him to be deported back to China. So we wanted</p> <p>20 to reduce the effectiveness of that political</p> <p>21 pressure by organizing other groups that would be</p> <p>22 rallying to say this guy is leading the</p> <p>23 opposition to China. Don't deport him back to</p> <p>24 Beijing.</p> <p>25 Q. What is this network? Is it other</p>
<p style="text-align: right;">Page 239</p> <p>1 Q. Criminal prosecution where?</p> <p>2 A. It was never specified. It could be</p> <p>3 London. It could be United States. He didn't</p> <p>4 mean China.</p> <p>5 Correction. Also in China because he</p> <p>6 had reasons for some of them who could be</p> <p>7 prosecuted in China with the information that he</p> <p>8 had.</p> <p>9 Q. In the next, I guess, little arrow or</p> <p>10 bullet, it says, "Break the party's control of</p> <p>11 corruption information." What does that mean?</p> <p>12 A. The party keeps its control. The</p> <p>13 Chinese Communist Party keeps its control by –</p> <p>14 it's sort of a symbiosis between the super rich</p> <p>15 who got rich off the party, and then the</p> <p>16 knowledge of their corrupt activities that the</p> <p>17 party and the secret police have.</p> <p>18 Q. What does the "break the party's</p> <p>19 control of corrupt information" mean?</p> <p>20 A. If you make the information public that</p> <p>21 certain pillars of the Chinese government are</p> <p>22 involved in corruption, right now it's only the</p> <p>23 secret police that has that information or the</p> <p>24 Chinese authorities who have that information,</p> <p>25 and they're using it for purposes of political</p>	<p style="text-align: right;">Page 241</p> <p>1 companies or individuals? Who's in the network?</p> <p>2 A. Main political activist networks and</p> <p>3 online activists.</p> <p>4 Q. How many different entities are in that</p> <p>5 network? Ballpark?</p> <p>6 A. It's really hard to say because there</p> <p>7 are networks of networks, so they're not</p> <p>8 necessarily cohesive. It's really impossible to</p> <p>9 say.</p> <p>10 Q. These are all American-based entities?</p> <p>11 A. North American, U.S. and Canada.</p> <p>12 Q. Below that it says, "Primarily the</p> <p>13 loose coalition that got Trump elected and to</p> <p>14 which Trump communicates through his Tweets."</p> <p>15 A. Yes.</p> <p>16 Q. What does that mean?</p> <p>17 A. That's the online "MAGA" network of</p> <p>18 supporters of Trump who hate the Chinese</p> <p>19 government.</p> <p>20 Q. How did they get Trump elected? I'm</p> <p>21 just trying to understand that comment.</p> <p>22 A. They were credited with doing the –</p> <p>23 Trump was running his campaign not through out of</p> <p>24 his pocket so much as saying outrageous things</p> <p>25 and using social media to get other people to</p>

EASTERN PROFIT CORPORATION LIMITED vs STRATEGIC VISION US, LLC  
J. Michael Waller on 02/08/2019

<p style="text-align: right;">Page 242</p> <p>1 echo everything he said. So we would want to use 2 that network, and that was credited with getting 3 him elected. 4 Q. So this isn't a group of Russian 5 hackers that got Trump elected? 6 A. No, no. 7 Q. It also says, "Citizen-journalists who 8 break news, expose opponents, attack opponents, 9 discredit critics"? 10 A. Right. 11 Q. So that's a different part of this 12 network? 13 A. Yes. 14 Q. How would you access that network? 15 A. I know them. 16 Q. So you can get these journalists to 17 write positive things about Mr. Guo or attack the 18 communists? 19 A. Or attack the people who wanted to get 20 him deported and say this person is doing it, but 21 this person also has money and is invested in 22 Chinese companies. And there might be other 23 reasons that the Chinese regime uses to leverage 24 Americans to do their work for them, do their 25 work for it.</p>	<p style="text-align: right;">Page 244</p> <p>1 Q. What do you mean by "information 2 offensive" there in italics? 3 A. Yes. Get off the defensive. Change 4 his image from an eccentric, exiled 5 billionaire – who can have sympathy for somebody 6 like that, right? – to somebody who is trying to 7 do the right thing and bring democracy to China. 8 Q. So this is kind of like a PR campaign 9 in a way that's being proposed? 10 A. Yes. 11 Q. Let's go to 390. Who is the gentleman 12 pictured on the top right there? 13 A. That is Mikhail Khodorkovsky. 14 Q. That's the individual you mentioned 15 earlier today? 16 A. Yes. He's the Russian political 17 opposition leader who's exiled in London. 18 Q. There's also a map here that's of the 19 Eurasian area with little numbers and 20 bull's-eyes. Do you see that? 21 A. Yes. 22 Q. What do those little markers or 23 bull's-eyes represent? There's numbers next to 24 them. 25 A. Yes. Those are locations in Russian</p>
<p style="text-align: right;">Page 243</p> <p>1 Q. So the previous group, that loose 2 coalition, is kind of just the broad MAGA group? 3 A. Younger activists. 4 Q. The second group is journalists for 5 hire essentially? 6 A. Not really for hire so much as people 7 who want a good story. 8 Q. I see. Then it says, "Effective in 9 getting the President's attention and influencing 10 policy." What does that mean? 11 A. Well, the President is known for 12 following Twitter quite closely, and so he has 13 certain – he follows a very small amount of 14 people, and he watches a certain network that's 15 in this building, so it's a question of getting 16 things on Fox and on Twitter. 17 Q. I see. And that gets the President's 18 eye on Mr. Guo in a positive light? 19 A. Yes. 20 Q. To prevent him from being deported? 21 A. Yes. 22 Q. Then it says, "Coordinate with the 23 above allied journalists in the U.S. and abroad 24 to remain on the information offensive." 25 A. Yes.</p>	<p style="text-align: right;">Page 245</p> <p>1 where organized anti-Putin protests had just 2 taken place. 3 Q. Let's just look at the one that's in 4 the Archangel region near Finland, the top left. 5 It says 100 to 150. Do you see that? 6 A. Yes. 7 Q. What does that mean? 8 A. That means that 100 to 150 people took 9 to the streets on that given day in the 10 nationwide-organized protests against Putin. 11 Q. When was that protest? 12 A. There were a few. I don't recall. 13 Q. It says below that, "Team with exiled 14 Russian opposition leaders and internal Russian 15 opposition activists." 16 A. Yes. 17 Q. What is the concept behind that idea? 18 A. In this case it's a vision to transform 19 the whole Eurasian region into democratic 20 societies in Russia and China, and to use the 21 synergies of the China centric people with those 22 of the Russia centric people and have them work 23 together. 24 Q. In other words, they're both oppressed 25 by horrible dictatorships. They might as well be</p>

EASTERN PROFIT CORPORATION LIMITED vs STRATEGIC VISION US, LLC  
J. Michael Waller on 02/08/2019

<p style="text-align: right;">Page 246</p> <p>1 on the same side?</p> <p>2 A. Right.</p> <p>3 Q. It says, "Link with Chinese people</p> <p>4 inside of Russia including cross-border traders</p> <p>5 for propaganda and organizational purposes."</p> <p>6 A. Yes.</p> <p>7 Q. What does that mean?</p> <p>8 A. There's a large Chinese population of</p> <p>9 both permanent, semipermanent, and migratory</p> <p>10 inside Russia, especially in central Russia and</p> <p>11 the Russian Far East, and along the border area</p> <p>12 illustrated on this chart on page 390.</p> <p>13 The idea is you work with those</p> <p>14 traders, Chinese traders who are in Russia, which</p> <p>15 is freer than China in this regard, to have them</p> <p>16 bring back pro-Guo, anti-regime material back</p> <p>17 into China as part of their trading roots, and</p> <p>18 the authorities don't bother them.</p> <p>19 So this is just a new way – as opposed</p> <p>20 to flying into Beijing where you're going to get</p> <p>21 caught. You just do it through the trading</p> <p>22 networks of Chinese nationals into Russia.</p> <p>23 Q. The idea would be to exploit the</p> <p>24 commercial connection between China and Russia to</p> <p>25 get information into China that's pro-Guo, so to</p>	<p style="text-align: right;">Page 248</p> <p>1 profit. He had – he's got his asset recovery</p> <p>2 here. He's getting leverage over bad actors in</p> <p>3 China. He can make a lot of money off this. So</p> <p>4 it's not simply a philanthropic or political</p> <p>5 operation. It could become advantageous to him</p> <p>6 as a businessman.</p> <p>7 Q. In terms of recovering his own money?</p> <p>8 A. Yeah.</p> <p>9 Q. Is there any other way that it would</p> <p>10 be?</p> <p>11 A. He spelled out some specific ways.</p> <p>12 They were his ideas, not ours. They were</p> <p>13 itemized earlier in this exhibit.</p> <p>14 Q. Is that concerning exposing corruption</p> <p>15 in China?</p> <p>16 A. Yes.</p> <p>17 Q. Let's go to 395. It says, "U.S.-based</p> <p>18 online army, same group as those who helped win</p> <p>19 Trump election." What does that mean?</p> <p>20 A. That was the online activists who I</p> <p>21 referred to earlier.</p> <p>22 Q. It's the same group. This is just a</p> <p>23 kind of recitation of that?</p> <p>24 A. Yes.</p> <p>25 Q. It says, "Attack tactics include</p>
<p style="text-align: right;">Page 247</p> <p>1 speak?</p> <p>2 A. Or that suits what he wants to achieve,</p> <p>3 yes.</p> <p>4 Q. Because it's typically difficult to</p> <p>5 get – let's call it – controversial information</p> <p>6 into China?</p> <p>7 A. Right.</p> <p>8 Q. Let's go to 394. It says here for</p> <p>9 single individual, regular monitoring with two</p> <p>10 competitive teams, \$2,805,000 per year, all costs</p> <p>11 included. Do you see that?</p> <p>12 A. Yes.</p> <p>13 Q. Was that like an initial price that was</p> <p>14 quoted to Mr. Guo and Eastern?</p> <p>15 A. Yes. Not Eastern, Mr. Guo.</p> <p>16 Q. It says above for one, but with one</p> <p>17 team only \$2,380,000.</p> <p>18 A. Yes.</p> <p>19 Q. Again, that was just an initial quote?</p> <p>20 A. Yes.</p> <p>21 Q. It says at the bottom, "This enterprise</p> <p>22 can easily become a profit-making venture."</p> <p>23 A. Yes.</p> <p>24 Q. How is that?</p> <p>25 A. Mr. Guo is a man who likes to make a</p>	<p style="text-align: right;">Page 249</p> <p>1 breaking news, creation &amp; deployment of memes</p> <p>2 (memetic warfare), defending friends, trolling</p> <p>3 opponents, exposing and isolating opponents in</p> <p>4 policy and media, swarming opponents."</p> <p>5 Are these tactics that are issued to</p> <p>6 this U.S.-based online army?</p> <p>7 A. That's what they practice already, so</p> <p>8 we would hire them to carry them out.</p> <p>9 Q. In hiring them, you would just pay them</p> <p>10 as you described earlier with anonymous hackers?</p> <p>11 A. No. It's people who want to write</p> <p>12 about it, want to develop those memes, want to</p> <p>13 make a living doing this rather than have their</p> <p>14 day job working at Walmart.</p> <p>15 Q. How are they paid, though? I just want</p> <p>16 to understand how they would make money.</p> <p>17 A. They would be paid either by check or</p> <p>18 by cash through a series of LLCs.</p> <p>19 Q. I see. Is it Strategic Vision that has</p> <p>20 the connections to this online army or is it you</p> <p>21 personally?</p> <p>22 A. Me personally.</p> <p>23 Q. Okay. Just how would that normally</p> <p>24 work? You would contact one of these groups</p> <p>25 online and send them a check if they agreed to</p>



EASTERN PROFIT CORPORATION LIMITED vs STRATEGIC VISION US, LLC  
J. Michael Waller on 02/08/2019

<p style="text-align: right;">Page 250</p> <p>1 promote the content that you wanted?</p> <p>2 A. Yeah, or I know them personally.</p> <p>3 Q. How big is this online army that you're</p> <p>4 able to access?</p> <p>5 A. It's 50 principal people with millions</p> <p>6 of followers who add the volume and the mass to</p> <p>7 the messages, so the re-tweeting and re-liking</p> <p>8 and all that other stuff.</p> <p>9 Q. So what? They, like, employ people who</p> <p>10 have Twitter accounts to promote this content</p> <p>11 or –</p> <p>12 A. Yes.</p> <p>13 Q. – how does it work?</p> <p>14 A. Yeah, somebody is on Twitter, has a</p> <p>15 certain following, has a certain stature in</p> <p>16 whatever audience that you're looking at, and</p> <p>17 then you pay them to do this type of work as part</p> <p>18 of whatever else they're doing.</p> <p>19 Q. Do they typically disclose that they're</p> <p>20 being paid to tweet about this subject?</p> <p>21 A. Some of them do.</p> <p>22 Q. But not all of them?</p> <p>23 A. I doubt it.</p> <p>24 Q. Let's go to 397. I see here that</p> <p>25 Hudson Institute and Atlas Foundation are</p>	<p style="text-align: right;">Page 252</p> <p>1 opponent leaders and group. Costs depends on</p> <p>2 your discussions with them."</p> <p>3 I'm trying to understand that. What</p> <p>4 does that mean?</p> <p>5 A. We had offered to introduce Guo to</p> <p>6 Khodorkovsky and others.</p> <p>7 Q. So does this have anything do with the</p> <p>8 actual research? So it's not a Russian network</p> <p>9 that would perform the investigatory research</p> <p>10 that you would request for an agreement like</p> <p>11 this?</p> <p>12 A. No.</p> <p>13 Q. There are these examples of Russia</p> <p>14 beyond Putin, China beyond communism.</p> <p>15 Do you see that?</p> <p>16 A. Yeah.</p> <p>17 Q. What are you talking about there? What</p> <p>18 is that?</p> <p>19 A. Well, the "Russian beyond Putin" refers</p> <p>20 to Khodorkovsky's plan to envision a Russia</p> <p>21 beyond Putin, because so many people sort of</p> <p>22 believed that Putin is forever. And there's</p> <p>23 going to be an end to it, so the question is how</p> <p>24 will there be an end to Putin's regime and then</p> <p>25 what's going to replace it.</p>
<p style="text-align: right;">Page 251</p> <p>1 circled?</p> <p>2 A. Um-hum.</p> <p>3 Q. Why is that?</p> <p>4 A. Because they are the smaller</p> <p>5 foundations that are effective, despite their</p> <p>6 small size.</p> <p>7 Q. I see. So was this \$11 million or so</p> <p>8 price point being kind of promoted as you should</p> <p>9 run an institution like these two?</p> <p>10 A. Yes. It was in response to his request</p> <p>11 for how much he was even thinking of pouring more</p> <p>12 in. And I said, "Pour too much in and people</p> <p>13 aren't going to take it seriously."</p> <p>14 Q. In other words, it's counterproductive</p> <p>15 to have an over-funded institution?</p> <p>16 A. It can be.</p> <p>17 Q. That's because people just think that</p> <p>18 it's a mouthpiece for someone or?</p> <p>19 A. Oh, they know it's a mouthpiece anyway.</p> <p>20 It's just an 800-pound gorilla as opposed to</p> <p>21 somebody else who fits in with, you know, with</p> <p>22 everyone else.</p> <p>23 Q. Let's go to 398. It says, "Russia</p> <p>24 Networking: Cost." "We will facilitate, but not</p> <p>25 manage or coordinate networking with Russian</p>	<p style="text-align: right;">Page 253</p> <p>1 So we had that vision. Let's stop</p> <p>2 obsessing about Putin and think about post-Putin</p> <p>3 Russia. The same as China. Nearly everyone</p> <p>4 seems to think that the Chinese Communist Party</p> <p>5 is forever. Our vision is to have a finite limit</p> <p>6 to the party rule, and so think of the People's</p> <p>7 Republic of China beyond the Chinese Communist</p> <p>8 Party.</p> <p>9 Q. I understand. Please turn to 401. It</p> <p>10 says, "Global electronic intelligence gathering</p> <p>11 and synthesis capability through social media</p> <p>12 monitoring."</p> <p>13 A. Yes.</p> <p>14 Q. Is that the investigatory research kind</p> <p>15 of work?</p> <p>16 A. That's part of what we had proposed,</p> <p>17 but we did not do this.</p> <p>18 Q. This is a different service?</p> <p>19 A. Yes.</p> <p>20 Q. How is this different? I just want to</p> <p>21 understand. What's the distinction between this</p> <p>22 global electronic intelligence gathering and what</p> <p>23 the research agreement contemplated?</p> <p>24 A. This particular line item is to</p> <p>25 collect, harvest data by electronic means through</p>

EASTERN PROFIT CORPORATION LIMITED vs STRATEGIC VISION US, LLC  
J. Michael Waller on 02/08/2019

<p style="text-align: right;">Page 254</p> <p>1 monitoring social media and then zeroing in on 2 who – as marketers do, for example. And then 3 zero in on who are the opinion leaders who have 4 the interest in these subjects and then target 5 messaging to them, or collect information from 6 them. 7 Q. Was it a way to get in contact with 8 like-minded people? Is that what the goal is? 9 A. Yes. Like-minded people, regime 10 propagandists. Guo supporters who have different 11 opinions of the regime or Guo opponents who have 12 different opinions of the regime. So how do you 13 identify everyone and everything? And then watch 14 what your adversaries are doing through social 15 media. 16 Q. So this wasn't part of the research 17 agreement, though? 18 A. No. 19 Q. On then just on the last page of this 20 it says, "Begin work with Russian opposition." 21 Who would begin work with the Russian 22 opposition? 23 A. French Wallop would have approached 24 Khodorkovsky, and if he agreed, fine. If not, we 25 would go to other opposition figures and see if</p>	<p style="text-align: right;">Page 256</p> <p>1 start-up costs, they are for security measures. 2 You go through a lot of computers, let's say, so 3 you're buying computers very often, so they look 4 like start-up costs. 5 Q. Right, but like a vehicle, for example, 6 is something you just buy once? 7 A. That's correct. 8 Q. So he would get \$25,000 a month, a 9 program director? 10 A. Yes. 11 Q. And is this you understood the team 12 would be of this size, in terms of – looking 13 just at item A, there is different types of 14 specialists and officers? 15 A. This was the initial one. It changed. 16 So this was his first cut. 17 Q. What was the second cut or subsequent 18 cut? 19 A. The subsequent cut where there would be 20 ten computer operators, ten computer researchers 21 and two linguists. 22 Q. Just so we're clear, this is the group 23 that you paid 250 to \$300,000? 24 A. Yes. 25 Q. But no more than that. That was the</p>
<p style="text-align: right;">Page 255</p> <p>1 there was an interest. 2 Q. That would be to what? Coordinate with 3 Mr. Guo? 4 A. Yes. 5 MR. GRENDI: Let's do 12. 6 (Waller Exhibit 12, Document Bates 7 stamped SVUS260, marked for identification.) 8 Q. Have you ever seen this document? 9 A. Yes. 10 Q. What is it? 11 A. This is a proposed budget, monthly 12 budget by team 1, by the team 1 leader. 13 Q. So the blacked-out portion of that, 14 that's some reference to the team 1 leader's 15 company? 16 A. Yes. 17 Q. The team 1 leader gave this to you? 18 A. Yes. 19 Q. It says, "1 Month Projected Cost 20 Analysis," right? 21 A. Yes. 22 Q. And is this just for the first month or 23 for kind of every month? 24 A. No. Some of these are start-up costs. 25 Although some of the things that look like</p>	<p style="text-align: right;">Page 257</p> <p>1 full sum of money paid to team 1? 2 A. If it was more, it wasn't significantly 3 more. 4 Q. Okay. So did you negotiate this budget 5 or is this just kind of an estimate? 6 A. It was his first estimate, and then 7 when we looked at the scope, he said, "Oh, we 8 need to do adjustments." So we got the 9 adjustments. 10 Q. He needed more people is what you're 11 saying? 12 A. He needed more computer people. 13 Q. Okay. Were there any other items that 14 changed? 15 A. I don't know. 16 Q. Did you haggle or negotiate with the 17 leader of team 1 about these costs? 18 A. Not the costs so much as the people. 19 We need to have X number of people on X number of 20 machines to meet the capacity for this first part 21 of the contract. 22 Q. So you just accepted whatever the cost 23 of these items were, but you were just concerned 24 about getting the work done? 25 A. Correct.</p>

EASTERN PROFIT CORPORATION LIMITED vs STRATEGIC VISION US, LLC  
J. Michael Waller on 02/08/2019

<p style="text-align: right;">Page 258</p> <p>1 Q. Got it.</p> <p>2 Did you give this to Ms. Wallop?</p> <p>3 A. Presumably, I don't recall.</p> <p>4 Q. You don't remember talking to her about</p> <p>5 it?</p> <p>6 A. We talked about it. I presume I gave</p> <p>7 it to her, but I don't remember.</p> <p>8 Q. Did you ever get any money back from</p> <p>9 team 1?</p> <p>10 A. No.</p> <p>11 Q. Did team 1 tell you that they were</p> <p>12 disappointed or upset that the engagement ended</p> <p>13 when it did?</p> <p>14 A. Yes.</p> <p>15 Q. What did they say? Or what did he say,</p> <p>16 I should say?</p> <p>17 A. He said that they liked the work.</p> <p>18 Q. Why is that? Did he explain why?</p> <p>19 A. They liked the challenge. They don't</p> <p>20 like communists of any kind. They don't like the</p> <p>21 Chinese government. They viewed it as the right</p> <p>22 thing to do as opposed to just a job.</p> <p>23 Q. So ideologically, team 1 was on board</p> <p>24 with this kind of work?</p> <p>25 A. All of our people were involved with</p>	<p style="text-align: right;">Page 260</p> <p>1 A. Yes.</p> <p>2 Q. So the SVUS265, I guess that's the</p> <p>3 different associates who worked on this</p> <p>4 engagement?</p> <p>5 A. Yes, on team 2.</p> <p>6 Q. Right. This is the team you described</p> <p>7 before that you said basically encountered only</p> <p>8 records-protected information?</p> <p>9 A. Yes.</p> <p>10 Q. And ASOG was only doing work within the</p> <p>11 United States for Strategic Vision, correct?</p> <p>12 A. Yes.</p> <p>13 Q. Why wasn't ASOG retained in the</p> <p>14 beginning of this engagement?</p> <p>15 A. Because as Exhibit 11 indicates, we had</p> <p>16 a proposal for two teams, two research teams.</p> <p>17 Guo agreed to only fund enough for one research</p> <p>18 team. So we didn't use a second team because we</p> <p>19 were setting up team 1. We had not – that was</p> <p>20 not part of the arrangement. So when Yvette</p> <p>21 instructed on February 1st that we find other</p> <p>22 means to do the work, that's when we engaged</p> <p>23 team 2.</p> <p>24 Q. Was there any additional cost</p> <p>25 contemplated by engaging team 2, at least with</p>
<p style="text-align: right;">Page 259</p> <p>1 this, yes, every last one.</p> <p>2 MR. GRENDI: Let's do 13.</p> <p>3 (Waller Exhibit 13, Document Bates</p> <p>4 stamped SVUS00262, marked for</p> <p>5 identification.)</p> <p>6 Q. Do you recognize this document or</p> <p>7 documents?</p> <p>8 A. Yes.</p> <p>9 Q. This is the business cards for ASOG?</p> <p>10 A. Yes.</p> <p>11 Q. Do you know why Adam Kraft has a little</p> <p>12 "Ghost King" on his business card? What does</p> <p>13 that mean, if you know?</p> <p>14 A. I have no idea. He was in the</p> <p>15 military.</p> <p>16 Q. This invoice on the next page, SVUS263.</p> <p>17 A. Yes.</p> <p>18 Q. This is what you were talking about</p> <p>19 before when you said that they invoiced you for</p> <p>20 over a hundred thousand dollars, but they only</p> <p>21 asked for \$5,000 –</p> <p>22 A. Correct.</p> <p>23 Q. – at the end of the day.</p> <p>24 And that was the money that was paid</p> <p>25 there to ASOG?</p>	<p style="text-align: right;">Page 261</p> <p>1 respect to Eastern's obligation?</p> <p>2 A. To Guo's obligation, yes. We</p> <p>3 anticipated paying something along these lines,</p> <p>4 over \$100,000 per tranche research per month,</p> <p>5 even more.</p> <p>6 Q. But there wasn't any amendment to the</p> <p>7 agreement with respect to this charge for Allied?</p> <p>8 A. No, we just wanted to keep the contract</p> <p>9 that we had with Guo.</p> <p>10 Q. So Strategic Vision was offering this</p> <p>11 ASOG service as a courtesy to try to save the</p> <p>12 engagement?</p> <p>13 A. Not so much, well, courtesy, yeah,</p> <p>14 courtesy to save the contract. Yes, yes in</p> <p>15 answer to your question.</p> <p>16 Q. Let's look at 14.</p> <p>17 (Waller Exhibit 14, Document entitled</p> <p>18 "All Source Intelligence Collection</p> <p>19 Posture", marked for identification.)</p> <p>20 Q. Just looking at the first page which is</p> <p>21 SV269, it says, "All Source Intelligence</p> <p>22 Collection Posture." What is this document?</p> <p>23 A. This is an ASOG document, part of their</p> <p>24 team 2 – part of their own promotional material.</p> <p>25 Q. So they gave this to you in connection</p>

EASTERN PROFIT CORPORATION LIMITED vs STRATEGIC VISION US, LLC  
J. Michael Waller on 02/08/2019

<p style="text-align: right;">Page 262</p> <p>1 with the assembly of team 2 engagement?</p> <p>2 A. Yeah, it's like a handout. It's a</p> <p>3 standard handout.</p> <p>4 Q. Do you understand what these little</p> <p>5 symbols, geometric shapes kind of scattered all</p> <p>6 over the globe represent or mean?</p> <p>7 A. Yes. It's better to see them in color.</p> <p>8 The legend is here on the right, so the shapes</p> <p>9 match up with Open Source Intelligence, which is</p> <p>10 OSINT. SIGINT, Signals Intelligence. GEOINT,</p> <p>11 Geospatial Intelligence, and Satellites. MASINT,</p> <p>12 which I don't know what it is, and HUMINT, which</p> <p>13 is Human Intelligence.</p> <p>14 Q. So this document describes what</p> <p>15 capabilities ASOG has in different parts of the</p> <p>16 world?</p> <p>17 A. Yes. And then the capable, and then</p> <p>18 developing and limited circles. The different</p> <p>19 colored circles show the extent of their</p> <p>20 capabilities at the time.</p> <p>21 Q. I see. So it looks like – maybe the</p> <p>22 colors are throwing me off here but – or lack of</p> <p>23 colors, I should say – but in North America,</p> <p>24 ASOG has essentially full capability and in other</p> <p>25 places of the world not so much?</p>	<p style="text-align: right;">Page 264</p> <p>1 Do you know what this document is?</p> <p>2 A. I don't recognize it.</p> <p>3 Q. You didn't draft it?</p> <p>4 A. Pardon me, no. Let me read it.</p> <p>5 Q. Oh, sure. You can read it, go ahead.</p> <p>6 A. Okay.</p> <p>7 Q. I was asking did you create this</p> <p>8 document?</p> <p>9 A. No.</p> <p>10 Q. Do you know who did?</p> <p>11 A. I don't know the people who created it.</p> <p>12 I do know that this was something that</p> <p>13 French Wallop had commissioned in Europe in</p> <p>14 February, early to mid-February.</p> <p>15 Q. So is this Strategic Vision work</p> <p>16 product?</p> <p>17 A. No. It's a research product that we</p> <p>18 were to have brought to Guo as part of the</p> <p>19 ongoing research, so it's just a different type</p> <p>20 of research.</p> <p>21 Q. Right. This is dated March 21, 2018,</p> <p>22 correct?</p> <p>23 A. Yes.</p> <p>24 Q. So was this research that was</p> <p>25 commissioned by Mr. Guo or Eastern?</p>
<p style="text-align: right;">Page 263</p> <p>1 A. Yes, that's the way it looks.</p> <p>2 Q. Is there any reason Strategic Vision</p> <p>3 elected to go with team 1 out the box instead of</p> <p>4 ASOG?</p> <p>5 A. We thought team 1 would be more</p> <p>6 aggressive for what Guo wanted to build his – to</p> <p>7 build what he said he wanted to build, and it was</p> <p>8 in a country where it was legal to do certain of</p> <p>9 the things that were needed to build out those</p> <p>10 capabilities.</p> <p>11 Q. Whereas ASOG is based in the</p> <p>12 United States and perhaps is subject to more</p> <p>13 restrictions? Is that what your understanding</p> <p>14 was?</p> <p>15 A. Yes. And we also did not want to be</p> <p>16 involved with U.S. intelligence services for our</p> <p>17 data. We wanted to have it as our own individual</p> <p>18 people.</p> <p>19 MR. GRENDI: We're on 15.</p> <p>20 (Waller Exhibit 15, Subject Chart,</p> <p>21 Bates stamped SVUS278, marked for</p> <p>22 identification.)</p> <p>23 Q. Turn to the second page, it says</p> <p>24 "Background Report" and it has two individuals</p> <p>25 names.</p>	<p style="text-align: right;">Page 265</p> <p>1 A. No. French Wallop commissioned this</p> <p>2 research as part of the contract in February. So</p> <p>3 if it's dated in March, that's probably when it</p> <p>4 was delivered. I don't know.</p> <p>5 Q. And was this ever delivered to Mr. Guo</p> <p>6 or Yvette or Lianchao?</p> <p>7 A. Anything after February 23rd we would</p> <p>8 not have delivered once there was litigation.</p> <p>9 Q. So you're saying this is research that</p> <p>10 was created for the contract at issue in this</p> <p>11 case?</p> <p>12 A. Yes.</p> <p>13 Q. Are these two individuals named on this</p> <p>14 background report listed as fish in Exhibit 6?</p> <p>15 A. I can check if you want me to leaf</p> <p>16 through it.</p> <p>17 Q. Just if you know right now off the top</p> <p>18 of your head?</p> <p>19 A. I don't know. What I do know is the</p> <p>20 reason they would be researched is because they</p> <p>21 were objects of interest through Lianchao,</p> <p>22 meaning Guo's objects of interest.</p> <p>23 Q. So do you know that these two</p> <p>24 individuals were named as subjects who should be</p> <p>25 researched?</p>

EASTERN PROFIT CORPORATION LIMITED vs STRATEGIC VISION US, LLC  
J. Michael Waller on 02/08/2019

<p style="text-align: right;">Page 266</p> <p>1 A. I believe I know. I mean, I did not 2 commission this. 3 Q. Right. 4 A. But remember, the whole fish metaphor 5 where you can't find something on one, well, 6 let's find something on somebody else who is not 7 in the top 15. 8 Q. I see. 9 A. And so it would have been under those 10 circumstances. 11 Q. So you didn't write this report. Do 12 you know who did? 13 A. No. We were not to write analytical 14 reports at all. 15 Q. So who would have? 16 A. This was a British firm. 17 Q. I see. Was it called Fletcher? 18 A. I don't know. 19 Q. Do you know if French Wallop edited or 20 participated in creating this report? 21 A. I believe she just commissioned the 22 report. 23 Q. In other words, she just ordered it 24 from another IT? 25 A. She said, "Pull out what you can on</p>	<p style="text-align: right;">Page 268</p> <p>1 says SVUS268. What is this document? It looks 2 like a family tree of sorts. 3 A. Yes. I'm not sure who originated this 4 document. I think it was team 2. On several 5 occasions we were trying to map out the 6 relationships because it's all families of 7 Chinese Communist Party leaders working through 8 mainly their out-of-wedlock children to move 9 money around. This is trying to visualize who is 10 related to whom and how to help the researchers 11 target who they're going after and understand the 12 dynamics among them. 13 Q. Is it fair to say this is team 2 14 foundational work? 15 A. Yes. 16 Q. Was this presented to Lianchao? 17 A. Yes. 18 Q. When was that? 19 A. Probably the same day the Document 267 20 was. 21 Q. For both of these documents, did you 22 ever get any feedback from Lianchao about what 23 Mr. Guo or anyone else thought about this 24 information? 25 A. Yes.</p>
<p style="text-align: right;">Page 267</p> <p>1 these individuals." 2 Q. I see. 3 MR. GRENDI: Let's go to 16. 4 (Waller Exhibit 16, Document Bates 5 stamped SVUS267 and 268, marked for 6 identification.) 7 Q. Do you recognize SV267 or 268? 8 A. Yes. 9 Q. Let's start with 267. What is this 10 document? 11 A. This is a product from team 2 showing 12 that different individuals on Guo's list shared 13 the same Social Security number, and shared it 14 with others who are not on the list, including 15 people with non-Chinese names. 16 Q. How is that possible? 17 A. Fraud. 18 Q. Did you present SVUS267 to Mr. Guo or 19 Lianchao or Yvette? 20 A. To Lianchao. 21 Q. When was that? 22 A. This would have been delivered around 23 mid-February, after we were instructed to 24 communicate only with Lianchao. 25 Q. Okay. Turning to the next page, it</p>	<p style="text-align: right;">Page 269</p> <p>1 Q. What was that? 2 A. That Guo was very upset. 3 Q. Was it explained to you why? 4 A. He thinks it's junk. 5 Q. You don't have any more information on 6 that? Just that he said it was junk? 7 A. That's the whole paradox here. You 8 have a client who says it's junk, but won't say 9 what's wrong. 10 Q. So you didn't understand why Mr. Guo or 11 anyone else would be disappointed with these 12 documents? 13 A. No. We thought he would be delighted 14 because you can bring a criminal case against all 15 of these people on the list in United States 16 courts for Social Security fraud and tax fraud; 17 valuable stuff. 18 Q. What about the second document? Is 19 there anything that you thought was actionable 20 about this information? 21 A. No. To my knowledge, this was just to 22 help the researchers understand the relationships 23 and the dynamics among the targets. 24 Q. Going back to 267, about the Social 25 Security numbers. Did you explain the criminal</p>

**EASTERN PROFIT CORPORATION LIMITED vs STRATEGIC VISION US, LLC**  
**J. Michael Waller on 02/08/2019**

<p style="text-align: right;">Page 270</p> <p>1 exposure that the individuals listed on this</p> <p>2 document would have to Lianchao?</p> <p>3 A. Yes.</p> <p>4 Q. What did he say?</p> <p>5 A. He seemed excited.</p> <p>6 Q. But I take it that you subsequently</p> <p>7 heard that Mr. Guo or Eastern was disappointed</p> <p>8 with this information?</p> <p>9 A. Yes. He thought it was junk.</p> <p>10 MR. GRENDI: Let's take five, if that's</p> <p>11 okay. We're in the homestretch here, try to</p> <p>12 get through these. We can go off the</p> <p>13 record, please.</p> <p>14 THE VIDEOGRAPHER: Off the record at</p> <p>15 4:58.</p> <p>16 (Whereupon, a short recess was taken.)</p> <p>17 THE VIDEOGRAPHER: Back on the record</p> <p>18 at 5:07.</p> <p>19 MR. GRENDI: I'm going to do</p> <p>20 Exhibit 17.</p> <p>21 (Waller Exhibit 17, Document Bates</p> <p>22 stamped Eastern 250, marked for</p> <p>23 identification.)</p> <p>24 BY MR. GRENDI:</p> <p>25 Q. Mr. Waller, do you recognize this</p>	<p style="text-align: right;">Page 272</p> <p>1 not on this medium. To answer your question, the</p> <p>2 purpose of starting this conversation was to set</p> <p>3 up a meeting after my return from Europe.</p> <p>4 Q. That was the meeting in Germany with</p> <p>5 the leader of team 1?</p> <p>6 A. Yes.</p> <p>7 Q. Looking at Eastern 257, this is your</p> <p>8 response to a rather long message from Ms. Wang.</p> <p>9 Do you see your response there starting with</p> <p>10 "Good to know"?</p> <p>11 A. Yes.</p> <p>12 Q. You wrote, "The reports are not actual,</p> <p>13 but to show how the work is being executed."</p> <p>14 Do you see that?</p> <p>15 A. Yes.</p> <p>16 Q. What do you mean by that?</p> <p>17 A. Because she kept complaining that</p> <p>18 there's no actionable information in these</p> <p>19 reports, and I had to explain yet again to her</p> <p>20 that they're not supposed to be actionable.</p> <p>21 These are the -- these are the preliminary</p> <p>22 reports, and in this case, this was a progress</p> <p>23 report to show how the work was being executed.</p> <p>24 Q. Turning to 259. Eastern 259. It says,</p> <p>25 "There's a disconnect that needs to resolve. Our</p>
<p style="text-align: right;">Page 271</p> <p>1 document? The first one is marked Eastern 250.</p> <p>2 A. I do not recognize this one, but I</p> <p>3 recognize it as a version of one that I have.</p> <p>4 Q. Are you Pyratz, or do you go by that</p> <p>5 code number?</p> <p>6 A. Pyratz.</p> <p>7 Q. Not spelled like pirates, like the</p> <p>8 "Pirates of the Caribbean."</p> <p>9 A. It was taken. Not rats, Pyratz.</p> <p>10 Q. Pyratz, sorry.</p> <p>11 And is this your -- a Signal</p> <p>12 conversation you had with Yvette Wang?</p> <p>13 A. It appears to be. There are Chinese</p> <p>14 characters, but I accept it as our</p> <p>15 correspondence.</p> <p>16 Q. Why did you start messaging with Yvette</p> <p>17 on or about January 29, 2018?</p> <p>18 A. Because Guo had instructed around the</p> <p>19 26th that I communicate only with her.</p> <p>20 Q. So had you been communicating with</p> <p>21 Lianchao prior to this date?</p> <p>22 A. Yes. Let me correct that. Let me</p> <p>23 correct that. At some time prior to this date.</p> <p>24 This was in direct -- I had not been</p> <p>25 communicating with her before just because I had</p>	<p style="text-align: right;">Page 273</p> <p>1 understanding was that the first 90 days would be</p> <p>2 for starting up and developing the data."</p> <p>3 Do you see that?</p> <p>4 A. Correct.</p> <p>5 Q. What was your understanding about the</p> <p>6 first 90 days of the research agreement?</p> <p>7 A. You're not going to get a substantial</p> <p>8 data flow in large quantity until you set up the</p> <p>9 operation. We started cold. We started cold in</p> <p>10 January, mid-January, so it's going to take a</p> <p>11 while. And we explained this. As one of the</p> <p>12 earlier exhibits showed in our discussions prior</p> <p>13 to the contract, it would take 90 days to gear up</p> <p>14 to a full capacity, but we would start producing</p> <p>15 information as we could right away. And so I'm</p> <p>16 talking to her about having to resolve this</p> <p>17 disconnect because she did not understand this at</p> <p>18 all.</p> <p>19 Guo understood it perfectly and</p> <p>20 Lianchao understood it perfectly. So she's</p> <p>21 coming back with these emphatic messages and</p> <p>22 saying that -- showing her deep satisfaction, as</p> <p>23 well as Guo's by this point, and I'm saying we</p> <p>24 need to resolve this disconnect.</p> <p>25 Q. You mean dissatisfaction?</p>



EASTERN PROFIT CORPORATION LIMITED vs STRATEGIC VISION US, LLC  
J. Michael Waller on 02/08/2019

<p style="text-align: right;">Page 274</p> <p>1 A. Dissatisfaction.</p> <p>2 Q. Did you understand that at times,</p> <p>3 Ms. Wang was just conveying translated messages</p> <p>4 from Guo or Eastern or other people?</p> <p>5 A. She indicated that. Yes, she indicated</p> <p>6 that in a couple of her texts.</p> <p>7 Q. So you understood that it wasn't just</p> <p>8 Yvette that was dissatisfied with what was being</p> <p>9 provided by Strategic Vision?</p> <p>10 A. Yes. Where she said she was quoting</p> <p>11 from Guo, she said it and she was apologetic</p> <p>12 about it in writing.</p> <p>13 Q. So your understanding was during the</p> <p>14 first 90 days of the agreement, it would be okay</p> <p>15 if no actionable material was delivered because</p> <p>16 that was the start-up phase?</p> <p>17 A. That was never the intent, and that was</p> <p>18 explicitly understood, yes.</p> <p>19 Q. Just turning to the next page, 260. It</p> <p>20 says "Had we understood this, we would have told</p> <p>21 him that it is not how it works in our</p> <p>22 experience."</p> <p>23 What are you conveying in that</p> <p>24 sentence?</p> <p>25 A. When we worked this out with him and</p>	<p style="text-align: right;">Page 276</p> <p>1 you this is impossible?</p> <p>2 A. No, we knew beforehand. Like anything,</p> <p>3 it takes time to ramp up. It takes time to build</p> <p>4 a case.</p> <p>5 Q. I see. Then on the next page, 261, it</p> <p>6 says, "Checked with him, the quickest and most</p> <p>7 efficient way is to use the ID information which</p> <p>8 you were provided to dive." Do you see that?</p> <p>9 A. Yes.</p> <p>10 Q. Do you know what Yvette was talking</p> <p>11 about in that message?</p> <p>12 A. Yes, she was talking about Exhibit 6.</p> <p>13 Q. Right. What did you understand her to</p> <p>14 want Strategic Vision to do?</p> <p>15 A. To pull up large quantities of</p> <p>16 actionable information immediately. Where she's</p> <p>17 talking about the social media stuff, we were</p> <p>18 showing them how our team was trying to</p> <p>19 understand their target. It was not designed –</p> <p>20 and we said this in the progress report. It was</p> <p>21 not designed to be part of the end product to</p> <p>22 Guo. It was just a progress report.</p> <p>23 Q. Then if you look at the following page,</p> <p>24 262. Is this at the time when you got in touch</p> <p>25 with ASOG to create a second team?</p>
<p style="text-align: right;">Page 275</p> <p>1 Lianchao, with Guo and Lianchao, it was explicit</p> <p>2 that the first data was not going to be</p> <p>3 actionable.</p> <p>4 Q. For the first three months?</p> <p>5 A. Roughly, yes. When Yvette took over,</p> <p>6 she expressed a very different view, that it had</p> <p>7 to be actionable.</p> <p>8 Q. That was before the contract was</p> <p>9 signed, right, when Yvette took over?</p> <p>10 A. She took over it during the final</p> <p>11 negotiation of the contract.</p> <p>12 Q. Right. Okay. It also says, "All my</p> <p>13 team say that it is seldom practical or possible</p> <p>14 to produce such rapid results, and that the best</p> <p>15 way for the reasons I explained to you is to</p> <p>16 cultivate the measures that I explained to you."</p> <p>17 What did your teams tell you about the</p> <p>18 practicality of producing actionable results?</p> <p>19 A. Given the amount of computing power</p> <p>20 involved in the type of work Guo wanted done,</p> <p>21 it's not possible to produce those immediate</p> <p>22 results. Not even an NSA, National Security</p> <p>23 Agency, can do that. It takes time to do.</p> <p>24 Q. Is this something you just kind of</p> <p>25 intuitively knew or did your team actually tell</p>	<p style="text-align: right;">Page 277</p> <p>1 A. Yes, roughly.</p> <p>2 Q. You said, "I will start a competing</p> <p>3 team to verify." Is that a reference to ASOG or</p> <p>4 the individuals you talked about checking in on</p> <p>5 team 1?</p> <p>6 A. Correct. That is the start of team 2</p> <p>7 right there.</p> <p>8 Q. That's team 2 you're talking about</p> <p>9 there?</p> <p>10 A. Yes.</p> <p>11 Q. Is there any reference to – or did you</p> <p>12 talk to Yvette or Lianchao or Mr. Guo about</p> <p>13 verifying the work of team 1 that we discussed</p> <p>14 earlier?</p> <p>15 A. Yeah. I mentioned quality control and</p> <p>16 to make sure that they were doing what we set</p> <p>17 them to do.</p> <p>18 Q. Let's go to 264.</p> <p>19 A. If I may add, what they were asking is</p> <p>20 far from best practices. We were trying to suit</p> <p>21 their needs by sticking to best practices.</p> <p>22 Q. Right. You described how you don't get</p> <p>23 the best data if you attack right away. You</p> <p>24 gotta build background information, right?</p> <p>25 A. Um-hum.</p>

EASTERN PROFIT CORPORATION LIMITED vs STRATEGIC VISION US, LLC  
J. Michael Waller on 02/08/2019

<p style="text-align: right;">Page 278</p> <p>1 Q. Is that a "yes"?</p> <p>2 MR. SCHMIDT: Out loud.</p> <p>3 A. Yes.</p> <p>4 Q. That's all right. It happens.</p> <p>5 Let's go back to 264, or forward to</p> <p>6 264, sorry. What did you mean by "I don't accept</p> <p>7 the kindergarten comments"?</p> <p>8 A. Above she said, we are advised many</p> <p>9 times – "As we advised many times before, both</p> <p>10 of us are college professors, not kindergarten</p> <p>11 kids." So I just said I don't accept that.</p> <p>12 Q. What did you understand her comment</p> <p>13 about kindergarten kids to mean?</p> <p>14 A. It was a juvenile condescending</p> <p>15 comment, so I was just pushing back.</p> <p>16 Q. Just going to the next page, 265. At</p> <p>17 the end you said, "This is a sophisticated group</p> <p>18 that has ably dealt with hostile military</p> <p>19 networks in combat environments. They hit all</p> <p>20 their targets. I trust them."</p> <p>21 A. Yes.</p> <p>22 Q. Who are you talking about there?</p> <p>23 A. Team 1.</p> <p>24 Q. How do you know that they've dealt with</p> <p>25 hostile military networks in combat environments?</p>	<p style="text-align: right;">Page 280</p> <p>1 Do you see that?</p> <p>2 It's not on the next page. It's in the</p> <p>3 bubble below.</p> <p>4 A. Yes.</p> <p>5 Q. Did you understand what Ms. Wang meant</p> <p>6 by "investors"?</p> <p>7 A. No. This was either the first or</p> <p>8 second time she mentioned investors. And the</p> <p>9 first time I – if this was not the first time, I</p> <p>10 took it as a misstatement. We'd never heard of</p> <p>11 any investors before.</p> <p>12 Q. Right. Did you ever discuss investors</p> <p>13 with Mr. Guo?</p> <p>14 A. No.</p> <p>15 Q. Were you perplexed by this use of the</p> <p>16 word "investors"?</p> <p>17 A. A lot of this perplexed me by this</p> <p>18 time.</p> <p>19 Q. But this – including the use of the</p> <p>20 term "investors" there?</p> <p>21 A. Yes.</p> <p>22 MR. GRENDI: I'm going to call it for</p> <p>23 now in terms of my examination. If there's</p> <p>24 a little time extra, I would like to come</p> <p>25 back because I have a couple of other</p>
<p style="text-align: right;">Page 279</p> <p>1 A. If I explain it I would have to</p> <p>2 indicate who they are, and I cannot indicate who</p> <p>3 they are.</p> <p>4 Q. So you're aware of – let's just put it</p> <p>5 this way.</p> <p>6 Are you aware of the hostile military</p> <p>7 network that they dealt with in a particular</p> <p>8 combat environment?</p> <p>9 A. Yes.</p> <p>10 Q. But you don't want to reveal that</p> <p>11 because you think that will reveal the identity</p> <p>12 of team 1?</p> <p>13 A. Yes.</p> <p>14 Q. But you do know that team 1 has</p> <p>15 experience in attacking a military network in a</p> <p>16 combat environment?</p> <p>17 A. Yes.</p> <p>18 MR. GRENDI: We will set this aside for</p> <p>19 our motion to compel issue if and when we</p> <p>20 get to that. We would obviously like to</p> <p>21 know the identity of team 1. We discussed</p> <p>22 that before.</p> <p>23 Q. Just going to the next comment there.</p> <p>24 It says, "The investors can pay your team without</p> <p>25 contract."</p>	<p style="text-align: right;">Page 281</p> <p>1 documents to go over. But I want to make</p> <p>2 sure that Ms. Teske has an opportunity to</p> <p>3 examine.</p> <p>4 MR. SCHMIDT: Just to go on the record</p> <p>5 here. We're going to be closing in on</p> <p>6 seven hours here, and so let's move it</p> <p>7 along. We've gone on to a lot of peripheral</p> <p>8 issues.</p> <p>9 We've gone over a lot of exhibits. I</p> <p>10 have not been interfering at all. We have</p> <p>11 not been late back from a break. We have</p> <p>12 had plenty of time, so let's just move</p> <p>13 efficiently as we jump back and forth here.</p> <p>14 We're getting near the end.</p> <p>15 EXAMINATION BY</p> <p>16 MS. TESKE:</p> <p>17 Q. Good afternoon, Mr. Waller. My name is</p> <p>18 Erin Teske, and I'm here today representing</p> <p>19 Mr. Kwok, the third-party defendant in this</p> <p>20 action.</p> <p>21 Did you have any conversations with</p> <p>22 Mr. Kwok that we have not discussed already</p> <p>23 today?</p> <p>24 MR. SCHMIDT: Objection. Do the best</p> <p>25 you can.</p>

EASTERN PROFIT CORPORATION LIMITED vs STRATEGIC VISION US, LLC  
J. Michael Waller on 02/08/2019

<p style="text-align: right;">Page 282</p> <p>1 A. Not that I'm aware of.</p> <p>2 Q. Did you meet with him in person at any</p> <p>3 point that we have not already discussed today?</p> <p>4 A. No.</p> <p>5 Q. Did you have any phone conversations</p> <p>6 with him that we have not already discussed</p> <p>7 today?</p> <p>8 A. No.</p> <p>9 Q. Any Signal conversations with him or</p> <p>10 other text-like conversations that haven't been</p> <p>11 produced?</p> <p>12 A. No.</p> <p>13 MS. TESKE: That's it.</p> <p>14 MR. SCHMIDT: Are you all done, Zach?</p> <p>15 MR. GRENDI: I mean, I think if I can</p> <p>16 get a couple of questions in. I know that</p> <p>17 this is an intimidating stack of documents,</p> <p>18 but there's not too much to it.</p> <p>19 Let's do this as 18.</p> <p>20 (Waller Exhibit 18, Supplemental</p> <p>21 Interrogatories submitted by Strategic</p> <p>22 Vision, marked for identification.)</p> <p>23 (FURTHER) EXAMINATION</p> <p>24 BY MR. GRENDI:</p> <p>25 Q. Mr. Waller, do you recognize this</p>	<p style="text-align: right;">Page 284</p> <p>1 Q. Let's go to paragraph 48. Just off the</p> <p>2 bat, do you recognize this document?</p> <p>3 A. I believe I do.</p> <p>4 Q. I'll offer that this is the Amended</p> <p>5 Answer and Counterclaims that was filed by</p> <p>6 Strategic Vision in this case.</p> <p>7 Is that your understanding of what this</p> <p>8 document is?</p> <p>9 A. Not having read through the whole</p> <p>10 thing, yes.</p> <p>11 Q. Fair enough. Going to paragraph 48,</p> <p>12 there are a number of conversations that are</p> <p>13 referred to.</p> <p>14 Take a look at that paragraph and let</p> <p>15 me know when you're done looking at it?</p> <p>16 A. Okay.</p> <p>17 Q. It says that Strategic Vision informed</p> <p>18 Mr. Guo of the seven different items there. Are</p> <p>19 those representations that Strategic Vision made</p> <p>20 or that you made?</p> <p>21 A. I as a contractor with Strategic</p> <p>22 Vision, as part of the Strategic Vision team</p> <p>23 made.</p> <p>24 Q. Okay. So you were authorized by</p> <p>25 Ms. Wallop to speak for Strategic Vision in</p>
<p style="text-align: right;">Page 283</p> <p>1 document?</p> <p>2 MR. GRENDI: I'll offer in the spirit</p> <p>3 of efficiency that this is supplemental</p> <p>4 interrogatories that were submitted by</p> <p>5 Strategic Vision.</p> <p>6 A. Okay.</p> <p>7 Q. Did you participate in creating this</p> <p>8 document?</p> <p>9 A. Yes.</p> <p>10 Q. It says in interrogatory number 2 that</p> <p>11 the principals of SV, Strategic Vision, are --</p> <p>12 French Wallop is the only principal.</p> <p>13 Do you see where it says that on the</p> <p>14 second page?</p> <p>15 A. Yes.</p> <p>16 Q. Is it your understanding that there are</p> <p>17 no other members of Strategic Vision?</p> <p>18 A. Yes.</p> <p>19 Q. That she's the sole member of Strategic</p> <p>20 Vision?</p> <p>21 A. Yes.</p> <p>22 Q. Let's take a look at the amended</p> <p>23 counterclaim, and that will be our last document.</p> <p>24 (Waller Exhibit 19, Amended Answer and</p> <p>25 Counterclaims, marked for identification.)</p>	<p style="text-align: right;">Page 285</p> <p>1 connection with this engagement?</p> <p>2 A. Yes.</p> <p>3 Q. Going to paragraph 49. It says that:</p> <p>4 "Mr. Guo informed Strategic Vision that</p> <p>5 he would cause his agreement with Strategic</p> <p>6 Vision to be entered into with a corporate entity</p> <p>7 controlled by him that he would fund as necessary</p> <p>8 to pay for Strategic Vision's services."</p> <p>9 Do you see that clause?</p> <p>10 A. Yes.</p> <p>11 Q. Do you recall hearing that alleged</p> <p>12 representation or were you not present?</p> <p>13 A. I was there.</p> <p>14 Q. You were there?</p> <p>15 A. Yes.</p> <p>16 Q. When was that?</p> <p>17 A. That was at one of the December</p> <p>18 meetings at his residence.</p> <p>19 Q. It says, "It was explicitly agreed such</p> <p>20 entity would not be based in the People's</p> <p>21 Republic of China or Hong Kong."</p> <p>22 A. Yes.</p> <p>23 Q. Was that also part of that</p> <p>24 conversation?</p> <p>25 A. Yes.</p>

EASTERN PROFIT CORPORATION LIMITED vs STRATEGIC VISION US, LLC  
J. Michael Waller on 02/08/2019

<p style="text-align: right;">Page 286</p> <p>1 Q. Do you know where Eastern Profit 2 Corporation is based? 3 A. No. 4 Q. Did you ever check? 5 A. We never heard of it before. 6 Q. So you or Ms. Wallop never looked into 7 where Strategic Vision – I'm sorry, strike that. 8 You or Ms. Wallop never looked into 9 where Eastern Profit was domiciled or 10 incorporated? 11 A. Your client doesn't even know. 12 Q. I'm asking you. 13 A. I'm just saying neither of us know. 14 Fair is fair. 15 Q. I'm asking if you know where it is 16 incorporated? 17 A. No. 18 Q. And you never checked that? 19 MR. SCHMIDT: Are you going to let us 20 know, Zach? 21 MR. GRENDI: I think it's in the answer 22 and counterclaim, so I don't think we need 23 to worry about that. 24 A. The judge asked you. Fair is fair. 25 Q. It's in Hong Kong?</p>	<p style="text-align: right;">Page 288</p> <p>1 A. Yes. 2 Q. Did the leader of team 1 describe what 3 precautions? 4 A. There were electronic precautions in 5 terms of changing passwords or changing behavior, 6 changing electronic behavior. 7 Q. What about laying a trap? 8 A. There was a concern, not confirmed, 9 that somebody might have known in advance that we 10 were going to be researching them and they may 11 have laid an electronic trap for such research. 12 Q. Can you describe that electronic trap a 13 little bit more? 14 I just want to understand kind of 15 conceptually what that means? 16 A. I can't do it in a technical sense, but 17 in a conceptual sense, it would be that they put 18 out bait for us to follow, so that then they 19 could confirm that they were indeed being 20 followed. 21 Q. And again, that was the leader of 22 team 1 that told you that? 23 A. Yes. 24 Q. Did you ever hear about attempts to 25 reverse the payment that came to Strategic</p>
<p style="text-align: right;">Page 287</p> <p>1 A. If you don't even know, I don't know. 2 MR. SCHMIDT: That's enough. 3 Q. Let's cool our nerves here. We're 4 almost done. 5 All I'm saying is, did you check to see 6 where Eastern Profit Corporation was 7 incorporated? 8 A. No. 9 Q. Okay. And did, to your knowledge, 10 Ms. Wallop check that either? 11 A. I don't know. 12 Q. Let's go to paragraph 67. It says in 13 this paragraph that some of the individuals had 14 taken precautions to block research into their 15 activities, and at least one of them appeared to 16 have laid a trap for Strategic Vision. 17 Do you see that? It's in the middle of 18 the paragraph. 19 A. Yes. 20 Q. Did you understand this information 21 from team 1 or how did you learn this? 22 A. From team 1. 23 Q. So team 1's leader told you that some 24 of the fish listed in Exhibit 6 had taken 25 precautions to block research?</p>	<p style="text-align: right;">Page 289</p> <p>1 Vision? 2 A. Yes. 3 Q. When did you hear about that? 4 A. On or about February – on or about 5 January 8, 2018. 6 Q. What did you hear? 7 A. I heard from French Wallop that she got 8 a notice from her bank, from Strategic Vision's 9 bank that one of the wires had been – the sender 10 of the wires had requested that one of them be 11 returned. 12 Q. Does she know when that reversal 13 request was sent? 14 A. I don't know. I'm sure she has the 15 records, but I don't know. 16 Q. So sitting here today, you don't know 17 if the reversal of the wire was attempted before 18 the contract was even signed? 19 A. I don't know. 20 MR. GRENDI: Thank you very much for 21 your time and patience today, Mr. Waller. 22 Any redirect there? 23 MR. SCHMIDT: No questions. 24 MR. GRENDI: Let's go off the record, 25 please.</p>

**EASTERN PROFIT CORPORATION LIMITED vs STRATEGIC VISION US, LLC**  
**J. Michael Waller on 02/08/2019**

<p style="text-align: right;">Page 290</p> <p>1 THE VIDEOGRAPHER: This concludes</p> <p>2 today's deposition of Mr. Waller. The time</p> <p>3 is 5:35. We are off the record.</p> <p>4</p> <p>5</p> <p>6 (Whereupon, the within proceedings</p> <p>7 concluded at 5:35 p.m., on the 8th day of</p> <p>8 February, 2019.)</p> <p>9</p> <p>10 * * * * *</p> <p>11</p> <p>12</p> <p>13</p> <p>14</p> <p>15</p> <p>16</p> <p>17</p> <p>18</p> <p>19</p> <p>20</p> <p>21</p> <p>22</p> <p>23</p> <p>24</p> <p>25</p>	<p style="text-align: right;">Page 292</p> <p>1 ERRATA SHEET</p> <p>2</p> <p>3 NAME OF CASE: EASTERN PROFIT v STRATEGIC</p> <p>4 DATE OF DEPOSITION: Friday, February 8, 2019</p> <p>5 NAME OF WITNESS: J. MICHAEL WALLER</p> <p>6 PAGE LINE FROM TO</p> <p>7</p> <p>8 _____</p> <p>9 _____</p> <p>10 _____</p> <p>11 _____</p> <p>12 _____</p> <p>13 _____</p> <p>14 _____</p> <p>15 _____</p> <p>16 _____</p> <p>17 _____</p> <p>18 _____</p> <p>19 _____</p> <p>20 _____</p> <p>21 _____</p> <p>22 _____</p> <p>23 _____</p> <p>24</p> <p>25</p>
<p style="text-align: right;">Page 291</p> <p>1 DECLARATION</p> <p>2</p> <p>3 I hereby certify that having been first</p> <p>4 duly sworn to testify to the truth, I gave the</p> <p>5 above testimony.</p> <p>6</p> <p>7 I FURTHER CERTIFY that the foregoing</p> <p>8 transcript is a true and correct transcript of</p> <p>9 the testimony given by me at the time and place</p> <p>10 specified hereinbefore.</p> <p>11</p> <p>12</p> <p>13 _____</p> <p>14 J. MICHAEL WALLER</p> <p>15</p> <p>16</p> <p>17</p> <p>18 Subscribed and sworn to before me</p> <p>19</p> <p>20 this ____ day of _____, 20____.</p> <p>21</p> <p>22</p> <p>23 _____</p> <p>24 NOTARY PUBLIC</p> <p>25</p>	<p style="text-align: right;">Page 293</p> <p>1 REPORTER'S CERTIFICATE</p> <p>2</p> <p>3 STATE OF NEW YORK )</p> <p>4 ) ss.</p> <p>5 COUNTY OF NEW YORK )</p> <p>6</p> <p>7 I, ROBERTA CAIOLA, a Shorthand Reporter</p> <p>8 and Notary Public within and for the State of New</p> <p>9 York, do hereby certify:</p> <p>10 That J. MICHAEL WALLER, the witness</p> <p>11 whose deposition is hereinbefore set forth, was</p> <p>12 duly sworn by me and that such deposition is a</p> <p>13 true record of the testimony given by such</p> <p>14 witness.</p> <p>15 I further certify that I am not related</p> <p>16 to any of the parties to this action by blood or</p> <p>17 marriage and that I am in no way interested in</p> <p>18 the outcome of this matter.</p> <p>19 In witness whereof, I have hereunto set</p> <p>20 my hand on this date, February 15, 2019.</p> <p>21</p> <p>22 ROBERTA CAIOLA</p> <p>23</p> <p>24</p> <p>25</p>

## EASTERN PROFIT CORPORATION LIMITED vs STRATEGIC VISION US, LLC

J. Michael Waller on 02/08/2019

Index: \$1..12th

\$	*	166:16,19,	263:3,5
		22 167:2	272:5
\$1 36:1,5	*r 20:1	168:8,9,12	277:5,13
157:11	22:20	174:10,14,	278:23
\$100,000	40:15	15,19,25	279:12,14,
261:4	154:19	175:4,12	21 287:21,
\$11 251:7	169:16	176:14,17,	22 288:2,
		19 177:3	22
\$111,000	-	178:7,14,	1's 287:23
219:18		15,24	
\$2 45:6	-yes 228:5	179:9,19	10 225:7,8
\$2,380,000		184:8	229:22,23
247:17	1	185:25	232:13
\$2,805,000	1 17:22	186:3,8	234:4
247:10	18:6,7,9,	191:9	100 184:1
\$25 121:5	10 33:25	192:7,9	245:5,8
\$25,000	42:2,15,16	193:10,18,	10th 177:1
256:8	46:24	25 194:5,	198:23
\$250 186:19	47:5,8	16,22,25	217:23,25
\$300,000	53:2 56:6	195:6	218:5,11
39:23 40:9	62:14	198:19	
41:9	67:17,23,	208:23	11 105:14
222:20	24 68:20	210:22	146:25
256:23	71:12 72:7	211:3,20	233:7,8
\$5,000	76:25	213:18	237:23
220:3,4	77:13,16,	218:2	260:15
259:21	23 78:4,5,	219:5	111,000
\$50,000	9,18,21	220:12,13,	220:6
223:15,16	79:4,9	18,20,23	
\$750,000	80:2,4,17,	221:4,9	11:28 74:7
91:13	18 82:15	222:10,13,	11:37 74:10
\$750,000-a-	83:14,24	19 224:5,	12 49:6
month 37:4	85:18	8,10,17	255:5,6
	86:15,17	255:12,14,	12:14 105:8
	95:2 96:2	17,19	
	144:2	257:1,17	12:20 105:11
	151:9,12	258:9,11,	12th
		23 260:19	149:11,14,



## EASTERN PROFIT CORPORATION LIMITED vs STRATEGIC VISION US, LLC

J. Michael Waller on 02/08/2019

Index: 13..26

17,25	21	220:4	65:1,19
152:4,8	175 189:12	221:2	144:2
13 259:2,3	177 190:10	260:5,23,	157:18
14 261:16,	17th 186:9	25 261:24	158:11
17	18 282:19,	262:1	194:21
15 50:10,	20	267:11	201:11
11,13	18th 118:19	268:4,13	203:11
64:22 70:4	19 283:24	277:6,8	204:9
92:19,20	1980s 109:24	283:10	208:19
95:15,18	1:28 157:4,	20 111:19	215:1,19
96:4	6	225:7,8	264:21
180:12	1:30 152:14	20002 9:3	271:17
182:24	1st 47:4,15	2007 114:25	289:5
183:25	94:1 95:3	2009 115:1	2019 290:8
184:2	133:15	2016 11:1	20th 103:20
192:12	143:22	12:8 13:21	186:10
202:8	216:3	2016-2017	21 264:21
236:17	217:11,15	11:12	22nd 200:11
237:2,3,	260:21	2017 11:1,	23 215:1,19
17,19,20		10,11,13	23rd 222:15
263:19,20		12:4,8	265:7
266:7		20:8,10	24 126:2
150 245:5,8	2	21:14,15	176:23
15th 102:8,	2 46:10,11	22:1 24:13	24th 129:19
16 206:19	47:6,17,20	35:22	25 225:8
207:1	56:19	46:12	250 222:20
16 65:10,	71:12	114:3	256:23
13,14	74:17	126:2	270:22
211:21	77:1,8,11	134:6	271:1
212:15	79:12 94:7	137:17	257 272:7
213:20,21	95:8	162:10	259 272:24
267:3,4	131:25	163:12	26 201:11
16th 102:6,	179:19,21,	166:25	203:11
8	22 184:11	2018 18:7	
17 270:20,	218:4	46:22	
	219:5,7		

## EASTERN PROFIT CORPORATION LIMITED vs STRATEGIC VISION US, LLC

J. Michael Waller on 02/08/2019

Index: 260..72

204:9	30	45:8	3:16	196:24	
208:19		49:3 50:7	3:25	155:3	6
260 274:19		53:23	3rd	158:11	6 46:22
261 276:5		65:1,19		160:11	55:12
262 276:24		95:19			84:24
		97:12			164:5,6
264 277:18		116:19		4	165:7
278:5,6		126:22	4	113:4,5	176:11
265 278:16		162:19	4,000	33:13	186:12,19
		194:21		34:6 92:18	214:2
267 267:9	30-day	92:6	401	253:9	236:6,14,
268:19	30-days'		48	151:25	17,23
269:24	44:7			284:1,11	237:9,21
268 267:5,7	300,000	96:8	49	285:3	265:14
26th 93:25	30th	183:19	4:58	270:15	276:12
102:10		194:20	4th	155:3	287:24
201:14		203:2			60 65:9
202:1		211:5			623 9:2
208:9		215:12		5	64 120:6
271:19	31st	102:9,	5	52:25	67 155:2
29 20:7,10	15			53:1 74:18	287:12
46:12	35	10:9		116:7,8	69 132:24
271:17		117:6	50	250:5	6th 100:3
29th 46:19		162:19	50/50	16:17	165:20
47:13	387	234:15	45:19		166:10
210:9	388	240:10	500,000	39:7	194:21
211:4	390	244:11			
215:12		246:12	5:07	270:18	7
2:15 157:8	394	247:8	5:35	290:3	7 48:2
2nd 157:17	395	248:17	5:35 p.m		71:12
158:11	397	250:24	290:7		79:11
	398	251:23			88:20
3	3:06	196:21			212:16,17
					72 143:6

## EASTERN PROFIT CORPORATION LIMITED vs STRATEGIC VISION US, LLC

J. Michael Waller on 02/08/2019

Index: 73..accurately

73	149:9		ably	278:18	174:3,10,
74	153:8	9	abroad	16:14	11 181:17
750	38:14	9 71:12		243:23	196:4
750,000		98:13	absolute		242:14
103:3		226:1,2	22:3 74:21		250:4
76	155:2	230:8	absolutely		accessed
		90 126:23	51:14,17		174:7
		127:2	81:15		accessible
	8	273:1,6,13	123:10		181:23
8	71:12	274:14	Abu	110:25	accident
95:17		90-day	Academi		90:11
96:12		127:12,15	115:4,5		account 44:1
214:24,25		92 70:3	academic		99:3
215:17		235:25	14:25		157:17
289:5		236:4,12,	44:25 56:4		158:10
80	183:18	14,16	accelerated		169:21
211:14,20,		237:8	209:1		171:7,8
25 212:23		93 110:7	accelerating		173:2,16
213:19		94 110:7	187:16		174:3,8,12
80,000	65:10	98 146:23	accept		accounting
80-gigabyte		9:59 7:6	207:20		39:11
213:8		9th 165:1	271:14		accounts
215:6		176:25	278:6,11		99:2 159:7
800-pound		198:23	acceptable		171:9,15
251:20		226:21	127:24		250:10
80s	116:17		129:13		accuracy
87	110:7	A	accepted		80:8
88	110:7	A-C-A-D-E-M-I	217:18		accurate
8th	7:6	115:5	257:22		28:8 32:25
165:1		A-S-O-G	access 43:25		108:1
290:7		179:23	167:23		178:18
		a.m. 155:3	170:14		224:6,10
			171:2		accurately
			173:16		8:14

## EASTERN PROFIT CORPORATION LIMITED vs STRATEGIC VISION US, LLC

J. Michael Waller on 02/08/2019

Index: accustomed..agent

<b>accustomed</b>	287:15	<b>addressed</b>	<b>adversaries</b>
56:3		60:14	254:14
	<b>activity</b>	127:3,6	
<b>achieve</b>	91:19		<b>advertise</b>
247:2	174:16	<b>addresses</b>	112:6
	179:2	213:22	
<b>acquired</b>	183:11	<b>adequately</b>	<b>advised</b>
188:13	221:16	148:6	171:16
			278:8,9
<b>acquiring</b>	<b>actors</b> 78:7	<b>adjusted</b>	<b>Advisors</b>
73:12	248:2	123:14	10:6 41:19
<b>acted</b> 68:6			
	<b>actual</b> 71:18	<b>adjustments</b>	<b>affixed</b>
<b>acting</b> 53:15	82:10,14	257:8,9	190:12
54:6 128:9	84:18 97:8		
159:24	182:21	<b>administrator</b>	<b>Afghanistan</b>
	252:8	171:4	11:5,17
<b>action</b>	272:12	<b>admired</b>	<b>afraid</b>
281:20		191:15	139:19
<b>actionable</b>	<b>Adam</b> 182:18		146:13
269:19	259:11	<b>admittedly</b>	
272:18,20		48:6	<b>afternoon</b>
274:15	<b>adapt</b> 71:2		281:17
275:3,7,18	<b>add</b> 250:6	<b>advance</b>	
276:16	277:19	43:16	<b>afterward</b>
		56:17	60:25
<b>active</b> 34:24	<b>added</b> 86:19	65:11	
180:16	<b>Addison</b>	139:21	<b>agencies</b>
184:22	77:8,11	166:18	101:15
185:7		202:21	184:25
	<b>addition</b>	211:19	<b>Agency</b>
<b>activist</b>	54:24	227:5	275:23
241:2	<b>additional</b>	288:9	<b>agent</b> 38:10
	260:24		46:22
<b>activists</b>		<b>advancing</b>	53:15 54:6
241:3	<b>address</b> 9:1	14:19	56:6
243:3	38:1		103:25
245:15	114:16	<b>advantage</b>	128:10
248:20	134:13	24:25	137:19
	167:22	<b>advantageous</b>	183:8
<b>activities</b>	213:25	248:5	217:7
136:12	214:13		
239:16			

## EASTERN PROFIT CORPORATION LIMITED vs STRATEGIC VISION US, LLC

J. Michael Waller on 02/08/2019

Index: agents..American-based

<b>agents</b> 54:24	38:13,17	253:23	<b>All's</b> 207:22
58:12 68:2	39:2,6,25	254:17	<b>all-in</b> 220:4
70:17 72:6	40:1,2,3,	261:7	<b>alleged</b>
86:11	4,7,12	273:6	136:11
<b>aggressive</b>	41:8,14	274:14	285:11
240:10	43:4,22	285:5	<b>allied</b>
263:6	46:11,18,	<b>agreements</b>	243:23
<b>agitated</b>	20,24,25	50:21	261:7
102:12	47:2,6,9,	<b>ahead</b> 19:20	<b>alligator</b>
206:9	13,25	21:3 29:8	125:9
207:6,7	50:4,16	32:21	<b>alternate</b>
<b>agree</b> 32:5	51:9,21	68:24	206:2
156:21	52:13 56:9	82:25	<b>alternatives</b>
<b>agreed</b> 26:14	57:5 59:18	86:21	140:20
36:14 86:5	62:25	90:20	<b>amend</b> 175:5
94:17	63:10	94:23,25	<b>amended</b>
102:9	64:15	95:4,13	283:22,24
128:4	75:1,21	97:6	284:4
129:14	78:16,17	132:12,20	<b>amendment</b>
131:18	85:13	137:15	261:6
149:10,13	88:24	150:23	<b>America</b>
152:5,8,19	96:25	193:6	139:2
158:23	98:1,23	205:20	262:23
159:23	100:7,14	208:15	<b>American</b>
205:14	124:11	213:4	77:9
208:8	129:14	231:11	115:20
249:25	130:2,6	264:5	116:2
254:24	133:20	<b>aid</b> 238:1,	136:20
260:17	142:18	13	171:15
285:19	149:25	<b>aircraft</b>	179:20
<b>agreement</b>	150:2,22	219:13	241:11
18:6 19:2,	157:21	<b>Airport</b>	<b>American-based</b>
4,9,23	158:24	212:1	241:10
22:24 27:6	163:10	<b>alert</b> 144:21	
32:12,16	197:1	170:18	
33:9 37:14	229:10,12	171:3	
	234:24		
	252:10		

## EASTERN PROFIT CORPORATION LIMITED vs STRATEGIC VISION US, LLC

J. Michael Waller on 02/08/2019

Index: Americans..armored

<b>Americans</b>	<b>Anita</b> 164:7	<b>apartment</b>	240:7
240:17	167:17	24:11 26:7	<b>applies</b>
242:24	169:21	31:1 33:10	178:4
<b>Amir</b> 155:5,	173:2	37:11	<b>applying</b>
8	174:8	135:17	69:21
	235:9	201:16	
<b>amount</b> 17:16	<b>Annenberg</b>	<b>apiece</b>	<b>apprehensive</b>
171:6	9:14	157:14	121:16
200:6	<b>annual</b> 96:18	<b>apologetic</b>	<b>approached</b>
243:13	<b>anonymity</b>	274:11	254:23
275:19	131:22	<b>apologize</b>	<b>approximately</b>
<b>amounts</b>	<b>anonymous</b>	209:11, 23	165:2
93:16	224:20, 21	<b>apologized</b>	186:4
<b>analogous</b>	225:9	205:12	200:5
66:11	249:10	209:24	223:16
<b>analysis</b>	<b>answers</b> 98:2	<b>apparent</b>	<b>Arabia</b> 111:4
68:4, 13	<b>anti-putin</b>	93:1	<b>Arabic</b> 106:5
228:7	245:1	<b>apparently</b>	<b>Archangel</b>
234:17	<b>anti-regime</b>	26:17 34:1	245:4
255:20	246:16	35:7 46:4	<b>area</b> 31:14
<b>analytical</b>	<b>anti-soviet</b>	<b>appeared</b>	78:6
56:2, 7	109:25	287:15	101:21
61:22	<b>anticipated</b>	<b>appears</b>	160:20
67:18	48:8 60:13	19:25	182:15
68:3, 8	261:3	71:16	223:20
69:16	<b>anxious</b>	105:23	244:19
266:13	124:20, 24	106:2	246:11
<b>analyzed</b>	125:23	113:17	<b>areas</b> 47:12
57:12	<b>anymore</b>	226:14	<b>Arlington</b>
71:11	45:14	271:13	176:17
<b>and/or</b> 63:7,	102:19, 20	<b>application</b>	192:19
17	116:1, 5	81:22	<b>armed</b> 156:13
<b>angry</b> 174:6	133:25	151:16	<b>armored</b>
205:17		<b>applications</b>	156:13, 16
207:8			



## EASTERN PROFIT CORPORATION LIMITED vs STRATEGIC VISION US, LLC

J. Michael Waller on 02/08/2019

Index: army..back

<b>army</b> 248:18	261:11, 23	<b>attack</b>	284:24
249:6, 20	262:15, 24	170:11	<b>authorizes</b>
250:3	263:4, 11	173:20	99:12
<b>arose</b> 23:22	276:25	206:4	<b>average</b>
<b>arrange</b> 15:6	277:3	242:8, 17,	50:12
30:10	<b>aspects</b> 32:3	19 248:25	<b>avoid</b> 34:22
37:21	<b>assemble</b>	277:23	37:20
159:21	27:23	<b>attacking</b>	39:15
175:24	29:15	205:7	159:3
<b>arranged</b>	<b>assembly</b>	279:15	199:22
166:18	262:1	<b>attempt</b>	210:25
<b>arrangement</b>	<b>asset</b> 238:2,	139:12	<b>avoiding</b>
38:15 54:6	14, 17	<b>attempted</b>	37:24
76:5	248:1	289:17	<b>aware</b> 223:5
260:20	<b>assets</b> 91:19	<b>attempts</b>	225:17
<b>arrested</b>	238:9, 19,	288:24	279:4, 6
137:2	20, 21	<b>attention</b>	282:1
<b>arrow</b> 239:9	<b>assignment</b>	243:9	
<b>as-needed</b>	157:12	<b>attorney</b>	<hr/> <b>B</b> <hr/>
27:23	162:2	83:2, 4	<b>baby</b> 125:9
<b>Asian</b> 209:13	<b>assistance</b>	<b>attorneys</b>	<b>bachelor's</b>
<b>asks</b> 119:7	54:12	73:22	9:6
120:7	<b>associates</b>	<b>audience</b>	<b>back</b> 16:8
<b>ASOG</b> 77:9	260:3	250:16	17:9 21:6,
179:23, 25	<b>assume</b> 40:18	<b>audio</b> 130:9	9 22:2
182:5, 11,	<b>assurance</b>	<b>authorities</b>	26:22
16 183:6,	120:15	36:24	28:16
22 184:14	<b>Assurances</b>	37:24	32:15
185:3, 10	120:15	98:25	37:10 55:1
191:11	<b>ate</b> 203:25	180:13, 19	60:20
218:15	<b>Atlas</b> 250:25	239:24	65:16
220:1, 2	<b>attached</b>	246:18	67:25 68:2
259:9, 25	202:12, 13	<b>authorized</b>	72:5, 6
260:10, 13		161:15	74:5, 9, 17
			80:15

## EASTERN PROFIT CORPORATION LIMITED vs STRATEGIC VISION US, LLC

J. Michael Waller on 02/08/2019

Index: back-and-forth..Beijing

105:10	278:5,15	<b>bare</b>	188:1	113:5
121:3	280:25	<b>bargain</b>		226:2
125:1	281:11,13	140:4		229:23
137:1	<b>back-and-forth</b>	<b>barrier</b>		230:2
143:14	93:1	131:22		233:10
144:16	129:17,22	<b>base</b>	240:13	255:6
150:17	<b>background</b>	<b>based</b>	31:20	259:3
152:2,6,	9:5 15:2	39:8 71:8		263:21
20,21	69:22	77:10 80:1		267:4
153:21	113:16	82:4		270:21
154:6	212:17	114:11	<b>battle</b>	24:18
157:7	263:24	139:1,2	<b>bear</b>	18:5
174:10	265:14	227:16,21	<b>began</b>	137:18
176:11	277:24	228:7		182:20
181:14	<b>bad</b> 69:3	231:5	<b>begin</b>	175:21
183:12	78:7 133:7	263:11		187:9
184:8	248:2	285:20		254:20,21
185:23	<b>bait</b> 288:18	286:2	<b>beginning</b>	
186:11	<b>balcony</b>	<b>basic</b> 32:17		85:15
192:6,20	146:14	141:8		108:3
194:10	<b>ballpark</b>	192:12		145:16
196:23	16:16 41:5	202:12		162:3
203:10	241:5	<b>basically</b>		186:4
205:11	<b>bank</b> 41:4	67:10		195:13
210:12	158:21,22	260:7		233:9
211:6,23	169:20	<b>basis</b> 27:23		260:14
213:8,9	171:7,8,9,	55:18	<b>begun</b>	56:15
215:6,17	15 289:8,9	95:12,14	<b>behalf</b>	7:20
217:10	<b>Bannon</b> 119:6	96:23		26:25
233:15	123:23,25	148:21		27:2,4
236:23	124:1,3,	156:3		129:2,4
237:23	10,13	209:1	<b>behavior</b>	
240:19,23	<b>bar</b> 65:2	<b>bat</b> 284:2		288:5,6
246:16	83:5	<b>Bates</b> 53:5	<b>Beijing</b>	
258:8	211:12	105:14		240:24
269:24				
270:17				
273:21				

## EASTERN PROFIT CORPORATION LIMITED vs STRATEGIC VISION US, LLC

J. Michael Waller on 02/08/2019

Index: beliefs..British

246:20	<b>bit</b> 14:13	<b>booked</b>	170:18
<b>beliefs</b>	24:20	210:16, 21	171:14, 15,
137:5	57:14	<b>booth</b> 212:9	20 193:8
	66:22		196:18
<b>believed</b>	132:20	<b>border</b>	200:12
252:22	202:4	110:23	239:10, 18
<b>Bernie</b>	233:14	246:11	240:2
137:22, 23,	288:13	<b>Boris</b> 110:6	242:8
24 138:6,	<b>bite</b> 33:7	<b>born</b> 25:8	281:11
7, 22 139:9			
<b>Beta</b> 9:6	<b>blacked-out</b>	<b>Boston</b> 9:8, 9	<b>break-in</b>
	255:13		170:3
<b>big</b> 30:7	<b>blackmail</b>	<b>bother</b>	<b>breaking</b>
72:13	240:1	246:18	53:20
121:11		<b>bottle</b> 233:4	249:1
183:11	<b>Blackwater</b>	<b>bottom</b> 25:11	<b>Bridge</b>
206:11	114:25	53:2 84:24	125:20
250:3	115:8, 12,	247:21	135:12
	16		
<b>bigger</b> 71:22	<b>blame</b> 122:3	<b>bound</b> 21:1	<b>briefly</b> 9:4,
<b>bill</b> 25:22		56:2	11 136:1
26:9, 10	<b>blank</b> 47:11	<b>box</b> 79:1	<b>bring</b> 26:12
117:2, 4, 5,	<b>blanks</b> 47:11	263:3	71:19
11 162:2, 9	<b>block</b>	<b>brainstorm</b>	110:17, 22
163:3, 9, 17	287:14, 25	12:14	165:16
219:18, 21	<b>blocking</b>	<b>brainstormed</b>	211:23
226:24	90:24	110:19	244:7
<b>billion</b>			246:16
186:18, 24	<b>blurb</b> 147:2	<b>brainstorming</b>	269:14
	152:3	110:18	
<b>billionaire</b>	155:3	228:16	<b>bringing</b>
136:19			11:25
244:5	<b>board</b> 52:16	<b>brand-new</b>	117:8, 22
	146:10	207:8	118:4
<b>billionaires</b>	162:22	<b>break</b> 8:16	135:6
25:2	258:23	14:13 29:9	<b>brings</b> 125:8
<b>bio</b> 114:24	<b>body</b> 50:6	52:4 74:5	
<b>birth</b> 8:23	<b>bonus</b> 36:12	157:1	<b>British</b>
187:3		168:16	266:16

## EASTERN PROFIT CORPORATION LIMITED vs STRATEGIC VISION US, LLC

J. Michael Waller on 02/08/2019

Index: broad..capacity

<b>broad</b>	243:2	191:18	155:5	39:19 77:9
<b>broke</b>	222:25	230:24	<b>butchering</b>	102:22
<b>broken</b>	96:23	234:15	108:5	266:17
<b>brought</b>		263:6,7,9	<b>buy</b> 31:21	<b>calling</b> 97:3
26:15,16		276:3	121:5	<b>calmed</b>
51:15		277:24	256:6	205:17
52:16	<b>building</b>		<b>buying</b>	206:9
65:16 94:7	13:5 42:16		231:14,19	<b>campaign</b>
156:1	62:4 121:6		256:3	112:15,17
169:3	146:17			227:25
193:25	231:18,20		<b>C</b>	233:10
264:18	232:9			241:23
	243:15		<b>C-I-T-I-C</b>	244:8
<b>brute</b> 170:11	<b>buildings</b>		167:20	<b>campaign-type</b>
173:20	146:5		<b>Caiola</b> 7:8	14:16
174:2	<b>bull's-eyes</b>		<b>California</b>	<b>Canada</b>
<b>bubble</b>	244:20,23		181:3	241:11
123:16	<b>bullet</b>		<b>call</b> 20:2	<b>Canadian</b>
134:16,17	239:10		22:20 30:4	179:15
137:21	<b>Burrow</b> 240:4		32:5 48:2	<b>capabilities</b>
280:3	<b>business</b>		51:1,2	15:11,12,
<b>bubbles</b>	9:17,19,20		72:22	18,20
118:12	11:4,9		73:14,15	29:5,6
<b>budget</b>	46:1,6,9		108:7	51:15
23:10,11	56:3		117:11,15	168:4,15
255:11,12	100:25		152:5	262:15,20
257:4	120:3		157:24	263:10
<b>budgeted</b>	131:3		158:3	<b>capability</b>
220:5	136:7		160:15	253:11
<b>budgets</b>	240:6,7		169:16	262:24
21:12	259:9,12		193:17	<b>capable</b>
<b>build</b> 12:18	<b>businessman</b>		247:5	262:17
64:23	122:3		280:22	<b>capacity</b>
89:12	248:6		<b>called</b> 7:22	257:20
93:18	<b>butcher</b>		24:12 30:5	
			32:2 34:23	

## EASTERN PROFIT CORPORATION LIMITED vs STRATEGIC VISION US, LLC

J. Michael Waller on 02/08/2019

Index: card..China

273:14	<b>cash</b> 225:4	213:9	69:14
<b>card</b> 259:12	249:18	<b>change</b> 92:17	276:6
<b>cards</b> 259:9	<b>casual</b> 58:25	244:3	286:18
<b>care</b> 85:20	163:5	<b>changed</b>	<b>checking</b>
140:23,25	<b>categories</b>	256:15	277:4
141:4	49:1,2	257:14	<b>Chiang</b>
174:2	50:12	<b>changing</b>	138:13,14
209:9	73:14	288:5,6	<b>children</b>
211:23	176:5	<b>channels</b>	25:7 268:8
<b>career</b> 16:8,	<b>category</b>	39:15	<b>China</b> 25:3
10 227:9	50:11	93:19	31:20
<b>careful</b> 18:4	73:15,17	<b>characters</b>	33:14,15
<b>Caribbean</b>	<b>caught</b>	214:7,9	34:16,17
271:8	246:21	271:14	53:19
<b>carried</b>	<b>caveat</b> 68:25	<b>charge</b> 96:25	86:23
135:15	<b>central</b>	147:4,17,	110:22,23
<b>carry</b> 249:8	246:10	21 148:8	124:7,15
<b>case</b> 13:13	<b>centric</b>	261:7	136:19
45:14	245:21,22	<b>chart</b> 246:12	137:5,14
77:21	<b>CEO</b> 182:18	263:20	138:11
82:16	<b>certificate</b>	<b>cheap</b> 121:23	167:20
86:11	8:24	122:2,4,	188:24
89:10,11,	<b>CFO</b> 182:19	15,18	196:13
12 93:14	<b>chain</b> 70:6	<b>cheated</b>	230:24
102:3	219:1	44:5,10,14	233:10
110:20	<b>chair</b> 204:23	<b>check</b> 22:3	238:7,9
187:12	<b>challenge</b>	41:11	239:4,5,7
245:18	258:19	181:25	240:9,19,
265:11	<b>challenges</b>	199:8	23 244:7
269:14	89:9	249:17,25	245:20,21
272:22	195:21,22	265:15	246:15,17,
276:4	<b>chance</b> 19:17	286:4	24,25
284:6	211:17	287:5,10	247:6
<b>cases</b> 82:22		<b>checked</b>	248:3,15
			252:14
			253:3,7
			285:21

## EASTERN PROFIT CORPORATION LIMITED vs STRATEGIC VISION US, LLC

J. Michael Waller on 02/08/2019

Index: Chinese..client

<b>Chinese</b>	241:18	15 92:1,9	218:13
24:18	242:22,23	93:4,12,21	220:13
25:2,12	246:3,8,	127:11	256:22
33:14	14,22	266:10	
34:22	253:4,7	<b>CITIC</b>	<b>clearance</b>
36:23	258:21	167:18,20,	185:8,13
37:24	268:7	22 168:14	<b>clearances</b>
39:16	271:13	173:2,16	182:7
50:24		174:8	184:22
53:17	<b>Chinese-built</b>	195:13	<b>cleared</b>
86:7,10,22	156:16		184:21,24
88:1 98:25	<b>chosen</b>	<b>Citizen-</b>	185:19,21
99:6	235:22	<b>journalists</b>	
104:11	<b>Christmas</b>	242:7	<b>client</b> 9:24
110:16	143:13	<b>City</b> 21:24	23:20 28:1
119:14,25	<b>CIA</b> 112:23,	30:14 65:2	50:5 66:19
123:20	24,25	231:22	71:2 74:20
130:19		<b>Civil</b> 138:11	75:4,9
132:1	<b>circled</b>		79:20
138:11	190:5	<b>civilian</b>	80:13 85:3
140:15,18	251:1	156:17	91:6,10
141:2	<b>circles</b>	<b>clarify</b>	92:3,12
145:24	262:18,19	77:21	93:2,5,8,
148:12			11 94:1,13
156:10	<b>circuitous</b>	<b>classified</b>	98:15
159:3,9	36:23	185:16	99:7,10,
167:19	37:23	<b>clause</b> 88:19	12,21,22
180:9,18	99:4,14	89:1 92:6	100:23
183:8,9	159:1,5,17	98:23	101:16
188:23	160:5	127:11	108:19,24,
189:4	<b>circumstance</b>	285:9	25 109:3
199:22	89:23 91:4	<b>clear</b> 9:24	131:3
203:23,25	94:9	43:21 61:8	132:8
221:17	<b>circumstances</b>	63:9 77:16	147:20
223:3	34:18	93:3 118:1	207:8,10,
230:25	88:19,23	128:7	18 209:19
239:13,21,	90:7,17	158:1	219:25
24 240:18	91:1,5,10,	190:23	233:1,2
			269:8



## EASTERN PROFIT CORPORATION LIMITED vs STRATEGIC VISION US, LLC

J. Michael Waller on 02/08/2019

Index: client's..communicates

286:11	<b>code</b> 65:10,	254:5	278:12,15
<b>client's</b>	11 87:6	<b>collected</b>	279:23
84:19	88:6,7	64:11	<b>comments</b>
101:14	169:25	<b>collecting</b>	190:20
140:7	170:1	68:10	191:3
<b>clients</b>	211:19,21	97:22	278:7
11:10	212:15	<b>collection</b>	<b>commercial</b>
12:15	213:20	234:17	240:5
13:1,4,5,8	214:15	261:18,22	246:24
14:7 19:2,	271:5	<b>college</b>	<b>commission</b>
10 66:4	<b>coded</b> 151:13	138:16	266:2
101:25	<b>cohesive</b>	278:10	<b>commissioned</b>
104:16	241:8	<b>color</b> 234:11	188:16
106:7,17,	<b>cold</b> 28:24	262:7	264:13,25
18,19,24	36:11	<b>colored</b>	265:1
107:4,8,10	273:9	262:19	266:21
119:21	<b>collaborating</b>	<b>colors</b>	<b>Committee</b>
131:2	73:25	125:11	17:8
161:2	180:18	262:22,23	<b>committing</b>
232:25	<b>collaboration</b>	<b>combat</b>	179:1
<b>close</b> 171:2	11:7	278:19,25	<b>common</b> 14:15
<b>closely</b>	<b>collaborative</b>	279:8,16	72:4
116:19	99:11	<b>combined</b>	137:13
243:12	<b>collate</b>	228:22	<b>communicate</b>
<b>closing</b>	64:21	<b>comfortable</b>	102:19,20
281:5	<b>collated</b>	11:12	133:17,21
<b>clothes</b>	64:11,18,	87:15	143:24
125:17,18	20	<b>command</b>	151:11
<b>co-counsel</b>	<b>collateral</b>	172:11	183:14
164:10	145:20,22	<b>commander</b>	185:20
<b>co-defendant</b>	<b>colleagues</b>	138:25	216:4,5
164:11	163:17	<b>comment</b>	267:24
<b>coalition</b>	<b>collect</b>	241:21	271:19
241:13	253:25	<b>communicates</b>	241:14
243:2			

## EASTERN PROFIT CORPORATION LIMITED vs STRATEGIC VISION US, LLC

J. Michael Waller on 02/08/2019 Index: communicating..computers

<b>communicating</b>	17:7 51:14	43:15	<b>complicated</b>
81:9 128:8	<b>community</b>	98:20	58:5
216:8	163:1	118:4	136:18
271:20,25	<b>companies</b>	<b>competing</b>	<b>comply</b>
<b>communication</b>	9:25 38:22	277:2	101:23
9:15 81:6,	188:17	<b>competitive</b>	<b>comprehensive</b>
13 200:9,	241:1	247:10	64:8,14
22 216:12	242:22	<b>competitors</b>	65:23
217:15	<b>companion</b>	188:19	66:6,10,12
<b>communications</b>	203:3	<b>compilation</b>	69:19
150:25	212:3	67:10	70:22
<b>communism</b>	<b>company</b> 10:5	<b>complained</b>	71:6,17,21
252:14	27:21 77:8	194:11	72:12,16
<b>Communist</b>	115:3	221:22	96:8
24:19,23	129:11	<b>complaining</b>	127:13
25:6,12	155:15	224:11	<b>comprehensiveness</b> 73:3
86:12	157:14	272:17	<b>compromise</b>
110:4	161:5,17	<b>complete</b>	173:9
130:18	255:15	47:14	<b>computer</b>
131:5	<b>company's</b>	95:22	14:25 20:6
132:7	158:10	<b>completed</b>	22:9 68:11
136:19	<b>compare</b>	67:15	71:9 82:10
137:3,5,14	47:12	<b>completely</b>	88:6 142:1
140:15,18	<b>compartmented</b>	32:25	169:2
141:3	131:21	36:13	182:1,22
145:25	<b>compel</b> 77:5,	92:10	203:6,15
188:23	22 279:19	140:7	212:4
189:5	<b>compensate</b>	173:23	234:7,8
239:13	44:24	<b>completing</b>	256:20
253:4,7	<b>compensated</b>	67:13	257:12
268:7	44:22	<b>complex</b>	<b>computers</b>
<b>communists</b>	95:12	201:17	22:13
223:3	148:21	<b>complicate</b>	169:9
242:18	<b>compensation</b>	147:22	203:8
258:20			213:14
<b>communities</b>			

## EASTERN PROFIT CORPORATION LIMITED vs STRATEGIC VISION US, LLC

J. Michael Waller on 02/08/2019

Index: computing..consult

256:2,3	<b>concludes</b>	288:8	246:24
<b>computing</b>	290:1	<b>confirms</b>	261:25
275:19	<b>conclusion</b>	132:21	285:1
<b>conceal</b>	221:19	<b>confiscated</b>	<b>connections</b>
98:24 99:5	<b>concurrence</b>	238:10,12	17:9 30:9
<b>concept</b>	102:11	<b>conflicted</b>	110:25
21:11	<b>condescending</b>	121:1	111:4,7,8,
88:22	278:14	<b>confront</b>	10,11,13
245:17	<b>conditions</b>	124:6	112:2
<b>conceptual</b>	35:3 37:12	<b>confrontation</b>	249:20
288:17	<b>conduct</b>	206:6	<b>conscious</b>
<b>conceptually</b>	142:8	<b>confused</b>	34:13
288:15	<b>conducted</b>	208:14	<b>consideration</b>
<b>concern</b>	80:20	<b>conjunction</b>	37:2 216:7
34:15,17	202:25	53:12	<b>consisted</b>
86:9 144:5	<b>conducting</b>	<b>connected</b>	192:11
147:3,6,9,	195:7	112:9	202:7
10,15,16	237:18	<b>connection</b>	<b>consistent</b>
148:8	<b>conferred</b>	10:24	94:11
288:8	26:15	29:11,21	<b>consolidating</b>
<b>concerned</b>	<b>confidence</b>	35:9,11	24:24
44:9 59:2	51:18	37:13	<b>constant</b>
104:2	134:11	38:16	49:12
144:14	163:7	40:7,11	200:9
147:19	<b>confidential</b>	41:8,13	<b>constitute</b>
257:23	23:18	42:14	200:13
<b>concerns</b>	<b>confidentialit</b>	44:12 45:3	<b>constituted</b>
99:9 127:6	<b>y</b> 28:1,2	49:18	62:16
148:6	74:22	67:20 98:1	<b>constitutes</b>
<b>concessions</b>	<b>confirm</b>	116:22	44:25
237:25	288:19	150:9	<b>constitution</b>
<b>concluded</b>	<b>confirmed</b>	157:11	156:20
72:18	96:2 131:6	175:12	<b>consult</b> 73:5
290:7		225:16	97:25
		232:9	

## EASTERN PROFIT CORPORATION LIMITED vs STRATEGIC VISION US, LLC

J. Michael Waller on 02/08/2019

Index: consulting..contractual

<b>consulting</b>	250:1, 10	76:1, 15	166:11
72:5		91:8 92:6,	168:22
	<b>contents</b>	14 94:18	173:14
<b>contact</b>	177:14	95:11, 18,	176:2, 4
53:24		21 96:7	186:5, 8
116:18	<b>context</b>	97:9, 19	194:13
134:4, 7, 9	48:22	98:6, 8	197:20
143:9, 23	126:7	99:19, 23	199:6, 20
181:3, 24	238:16	100:22	206:19
210:18	<b>continue</b>	102:13	216:2, 9
216:3	17:24 77:7	109:5, 15,	237:5
249:24	104:18	16 112:4	257:21
254:7	112:24	113:24	261:8, 14
	145:8	114:5	265:2, 10
<b>contacted</b>	161:25	115:16	273:13
117:5	167:7	122:12	275:8, 11
<b>contacts</b>	238:23	123:14	279:25
15:21		125:15	289:18
17:11, 13,	<b>continued</b>	126:25	
16 51:12	131:12	127:3, 6, 17	<b>contractor</b>
72:25	133:21	128:23	10:5 28:7,
73:10	209:15	130:23	9 51:16
163:1	220:18	131:7, 9	55:12
224:7	<b>continuing</b>	133:10	74:21, 23
	208:11	135:19	75:21, 24
<b>contained</b>		136:23	79:13 82:3
24:7	<b>contract</b>	139:23	84:25 85:1
213:19	12:22	140:2	89:25 93:4
216:24	22:5, 6, 16	141:1	98:16, 20
	34:9	142:12, 14,	99:8
<b>contemplate</b>	35:17, 21	16 149:16	100:24
85:13	36:16 45:8	150:10	284:21
<b>contemplated</b>	46:3 48:7,	154:7, 9, 12	
51:9	9, 18 49:1	156:24	<b>contractors</b>
124:10	57:21, 22,	158:16	45:24
159:5	25 58:23	159:16	
253:23	60:14	161:6	<b>contractual</b>
260:25	62:1, 5, 19	164:23	11:6 32:7
	70:25		229:8
<b>content</b>	74:17 75:6		

## EASTERN PROFIT CORPORATION LIMITED vs STRATEGIC VISION US, LLC

J. Michael Waller on 02/08/2019

Index: control..costs

<b>control</b>	143:20	192:3	218:3
41:15	148:5	205:4	239:5
89:25	173:4	<b>corner</b> 53:2,	<b>correctly</b>
138:25	197:21	5 189:14	30:20 70:3
141:15	<b>conveyed</b>	226:7	123:6
144:6	136:2	<b>corporate</b>	153:4
239:10,12,	184:18	27:24	174:9
13,19	194:7	28:25	<b>corresponded</b>
240:1	198:17	285:6	152:2
277:15	201:4	<b>Corporation</b>	<b>correspondence</b>
<b>controlled</b>	219:14	7:4 167:21	116:13
285:7	<b>conveying</b>	286:2	128:10
<b>controversial</b>	126:6	287:6	271:15
247:5	218:18	<b>correct</b>	<b>corrupt</b>
<b>conversation</b>	274:3,23	13:20	239:16,19
49:25	<b>convinced</b>	39:10 40:8	<b>corrupted</b>
53:12	173:14	42:12	165:14,23
54:10 79:6	<b>cool</b> 287:3	70:20	166:7
80:20	<b>coordinate</b>	75:24	<b>corruption</b>
141:22	176:7	96:24	146:12
142:15	243:22	116:6	239:11,22
143:2,4	251:25	130:4,8	248:14
159:14	255:2	154:18	<b>cost</b> 96:23
200:21	<b>copies</b> 69:12	183:20	121:19
271:12	85:2	186:10	207:9
272:2	150:7,8	200:23	220:4
285:24	<b>copy</b> 150:6	236:2,18	223:12,24
<b>conversations</b>	169:14	256:7	232:15
23:3 53:14	190:19	257:25	251:24
142:11	191:6,8	259:22	255:19
227:16,21	231:8	260:11	257:22
281:21	234:11	264:22	260:24
282:5,9,10	<b>copying</b>	271:22,23	<b>costs</b> 39:9
284:12	233:14	273:4	42:8 44:20
<b>convey</b> 51:18	<b>cordial</b>	277:6	223:5,9,17
89:6 142:8		<b>Correction</b>	

## EASTERN PROFIT CORPORATION LIMITED vs STRATEGIC VISION US, LLC

J. Michael Waller on 02/08/2019

Index: Council..D.C.

225:15	210:14	<b>creating</b>	225:4
247:10	263:8	228:13	<b>cultivate</b>
252:1	<b>County</b> 30:15	266:20	275:16
255:24	<b>couple</b> 8:9	283:7	<b>cultural</b>
256:1,4	12:11	<b>creation</b>	50:25
257:17,18	210:8	249:1	<b>cumbersome</b>
<b>Council</b>	274:6	<b>credited</b>	88:3 89:19
115:20	280:25	36:14	<b>curious</b>
116:2	282:16	241:22	158:15
<b>counsel</b> 7:11	<b>court</b> 7:7	242:2	<b>currency</b>
<b>count</b> 200:17	8:12,15	<b>crime</b> 171:16	224:24
<b>counted</b>	98:18	180:14	<b>current</b>
236:13	107:23	181:4,6,11	52:18,20
<b>counterclaim</b>	139:13	220:7	66:21
283:23	140:1	<b>crimes</b>	<b>custom</b> 228:6
286:22	146:19	171:18	<b>customarily</b>
<b>Counterclaims</b>	<b>courtesy</b>	<b>criminal</b>	232:24
283:25	261:11,13,	180:17	<b>customers</b>
284:5	14	183:10	104:16
<b>counterintelli</b>	<b>courts</b>	221:16	<b>cut</b> 256:16,
<b>gence</b> 180:17	269:16	238:1,13,	17,18,19
<b>countermeasure</b>	<b>cover</b> 42:2	24,25	<b>cutout</b> 148:3
<b>s</b> 89:17	<b>crazy</b> 109:22	239:1	161:21
145:6	<b>create</b> 68:14	269:14,25	<b>cutouts</b>
<b>counterparty</b>	80:11	<b>criteria</b>	84:21 99:5
100:7	264:7	79:12	
<b>counterproduct</b>	276:25	<b>critics</b>	
<b>ive</b> 251:14	<b>created</b>	242:9	
<b>countries</b>	213:6	<b>crooked</b>	<b>D</b>
16:20 73:7	227:22	196:8	<b>D.C.</b> 9:3,14
99:5 159:8	233:25	<b>cross-border</b>	30:14
<b>country</b>	234:2	246:4	31:14,20,
58:10	264:11	<b>crypto</b>	22 32:10
168:10	265:10	224:24	114:9
			121:6



## EASTERN PROFIT CORPORATION LIMITED vs STRATEGIC VISION US, LLC

J. Michael Waller on 02/08/2019

Index: dad..December

160:19,20	183:18	<b>dated</b> 20:7	273:1,6,13
176:17	192:12	46:19,22	274:14
223:20	195:24	47:5,14	<b>dead</b> 69:2
231:18,21	200:7,8	214:25	89:13
<b>dad</b> 138:3	202:4,20	264:21	90:25
	203:19	265:3	
<b>Dallas</b>	208:9	<b>dates</b> 175:7	<b>dealt</b>
182:14	211:14,21,	187:2	278:18,24
<b>damage</b>	25 212:23	218:9	279:7
145:20,22	213:10,17,	<b>day</b> 56:19	<b>deceased</b>
146:2,3	19 216:24,	59:20	138:9
174:17	25 219:14	100:2	<b>December</b>
<b>danger</b>	221:24	151:22	20:7,10
144:10	237:15	157:25	21:14,15
	253:25	166:3,5,11	22:1 24:13
<b>darker</b>	263:17	193:22	26:6 33:2
118:13,15	273:2,8	210:13	35:22
<b>data</b> 17:18	275:2	237:9	37:11
56:4 61:20	277:23	245:9	46:12,19
62:2 64:5,	<b>database</b>	249:14	47:13
18 65:4	184:3,13	259:23	57:21
66:9 67:18	<b>databases</b>	268:19	58:22
68:19	181:20	290:7	62:11
69:19			100:4,11
71:10	<b>date</b> 7:5	<b>days</b> 37:18	104:20
72:19 80:7	18:19 22:3	45:8	110:19
87:3 88:9	101:17	56:16,18	118:19
89:8	146:24	72:3 94:18	125:13,15
93:16,18,	157:16	100:11,25	126:2
19,21	166:12	103:19	129:19
97:23	176:22	126:22,23	134:6
127:25	197:24,25	127:2	137:17
128:17	198:2	143:10	143:11
167:18	199:1,3,4	165:24	149:11,14,
176:20	206:25	166:4,5,6	17,25
178:6	226:23	195:11,25	152:4,8
180:3	271:21,23	210:8	159:20
182:1		218:10	162:10

## EASTERN PROFIT CORPORATION LIMITED vs STRATEGIC VISION US, LLC

J. Michael Waller on 02/08/2019

Index: decided..democratic

163:12	156:18	209:24	<b>delivered</b>
166:25			58:7 64:6
167:7	<b>defendant</b>	<b>delegate</b>	69:17
226:21	281:19	83:11	70:10, 14
232:4, 5	<b>defending</b>	<b>delete</b>	183:18
285:17	136:9	150:6, 18,	193:20
	249:2	21 151:22	197:4, 7,
<b>decided</b>		219:2	12, 13, 17
229:14	<b>defense</b>		200:3
	73:21	<b>deleted</b>	202:3
<b>decline</b>	117:6	151:4, 8, 10	211:10
77:14			216:23
<b>decrease</b>	<b>defenses</b>	<b>delighted</b>	217:25
95:19	171:2	269:13	265:4, 5, 8
<b>decryptable</b>	<b>defensive</b>	<b>deliver</b>	267:22
214:14	156:12	48:16	274:15
	244:3	51:12	
<b>decrypting</b>		58:12	
214:16	<b>define</b> 44:19	67:23 68:2	<b>delivering</b>
	56:9 90:22	69:10	64:17 68:7
<b>deduct</b>	<b>defined</b>	72:7, 8	72:5 88:14
36:17, 18	45:16 56:1	176:3	92:11
<b>deemed</b> 98:19	66:10	196:25	93:5, 22
	75:21	206:13	
<b>deep</b> 67:7	126:11	216:10	<b>delivery</b>
82:24		217:1	65:1
147:3, 10,	<b>defining</b>		89:19, 22
15, 16	126:17	<b>deliverable</b>	193:21, 24
273:22	<b>defrauded</b>	48:17	217:6, 17
<b>deepest</b>	139:20	64:21 65:6	<b>demand</b> 36:7
139:5	<b>degree</b> 9:6, 8	127:24	<b>demands</b> 61:1
<b>defeat</b>	84:12	<b>deliverables</b>	209:16
173:22	<b>delay</b> 91:24	49:8 50:7	
<b>defector</b>	94:10, 14	51:17	<b>democracy</b>
137:8	220:17	81:24 82:4	53:21
		87:18 95:8	104:11
<b>defectors</b>	<b>delayed</b>	126:11	244:7
227:10	193:3	127:2, 19,	<b>democratic</b>
<b>defend</b>	<b>delays</b>	22	245:19

## EASTERN PROFIT CORPORATION LIMITED vs STRATEGIC VISION US, LLC

J. Michael Waller on 02/08/2019

Index: demonstration..deviating

<b>demonstration</b>	37:1	53:11	51:23
202:9	126:12	153:1	188:10
235:14	136:8	234:23	199:13, 14
<b>Department</b>	152:5, 18,	<b>deserter</b>	<b>detailing</b>
31:24	20	137:9	40:20
121:8	<b>deposited</b>	<b>design</b> 41:12	<b>details</b> 97:8
231:18	158:9	156:15	159:4, 10
<b>depend</b>	<b>deposition</b>	<b>designated</b>	<b>detection</b>
142:25	7:3 8:6, 7	180:13	34:22
<b>dependent</b>	40:25	<b>designation</b>	37:24
148:24	290:2	183:25	39:15
149:3	<b>describe</b> 9:4	184:15	89:16
<b>depending</b>	14:24	<b>designed</b>	159:3, 9
21:13	22:10, 22	228:6	223:2
152:1	33:25	276:19, 21	<b>detective-type</b>
<b>depends</b>	50:17	<b>desire</b> 240:2	15:1
151:24	59:15, 23	<b>desk</b> 204:19	<b>determine</b>
187:12, 13	101:9	<b>destabilize</b>	38:11
194:17	107:17	141:2	<b>develop</b>
233:1	136:1	<b>destabilizing</b>	156:12
252:1	154:11	156:10	249:12
<b>deplete</b> 42:7	162:5	<b>destroy</b>	<b>developed</b>
<b>deplorable</b>	169:24	150:7	23:4, 9, 10
221:23	171:21	<b>destroyed</b>	60:24
<b>deployment</b>	179:21	23:17	<b>developing</b>
249:1	183:21	128:16	21:11, 12
<b>deport</b>	211:24	<b>destroying</b>	262:18
240:23	<b>describes</b>	150:11	273:2
<b>deported</b>	262:14	<b>detail</b> 45:16	<b>development</b>
240:19	<b>describing</b>	59:24 81:9	9:20
242:20	115:23	109:21	<b>deviate</b>
243:20	142:11	163:6	66:19
<b>deposit</b>	164:20	<b>detailed</b>	<b>deviating</b>
36:1, 14, 18	217:17		61:7
	<b>description</b>		

## EASTERN PROFIT CORPORATION LIMITED vs STRATEGIC VISION US, LLC

J. Michael Waller on 02/08/2019

Index: Dhabi..discussion

<b>Dhabi</b>	110:25	95:23	270:7	34:5, 20
<b>dialogue</b>		<b>digital</b> 88:4	<b>disappointment</b>	36:21
80:16				37:2, 7
124:9, 20		<b>dining</b> 23:3	134:18, 23,	63:5, 6
125:24		204:24	25 205:1	88:23
132:2		<b>diplomacy</b>	<b>disclose</b>	122:5, 6
		164:3	78:10	123:21
<b>dialoguing</b>			225:2	127:11, 14
126:16		<b>diplomatic</b>	250:19	134:25
		17:6 51:13		159:6, 11,
<b>dictatorships</b>			<b>disconnect</b>	19 162:13
227:10		<b>diplomatic-</b>	272:25	204:7
245:25		<b>quality</b> 86:6	273:17, 24	209:17
				230:21
<b>difference</b>		<b>direct</b> 98:15	<b>discover</b>	231:7, 9, 10
49:16		135:1	91:22	277:13
50:25 59:9		271:24		279:21
136:6		<b>directed</b>	80:14 96:2	281:22
214:5		94:3		282:3, 6
			<b>discoveries</b>	
<b>differences</b>		<b>directly</b>	71:4	
25:1 156:3		21:18 22:6		<b>discussing</b>
		28:6 35:23	<b>discredit</b>	12:9 33:11
<b>difficult</b>		37:21	242:9	117:4
58:14		44:16		121:15
60:17		63:7, 14	<b>Discreet</b>	124:2
125:22		70:16 99:8	224:25	204:21
145:5		185:4	<b>discuss</b>	
247:4			13:13	
			159:17	<b>discussion</b>
<b>difficulty</b>		<b>director</b>	162:1	57:2 62:20
54:16		256:9	217:5	63:13
			280:12	64:13, 16
<b>dig</b> 61:20		<b>disagreed</b>		66:23
64:19		36:13		80:16
70:13			<b>discussed</b>	87:21
85:22 86:1		<b>disagreement</b>	11:9	125:8
196:15		62:15	22:23, 25	127:16
237:16		<b>disappointed</b>	23:11	135:23
		135:4, 15	30:18	160:4
<b>digging</b>		209:22, 25	31:20	162:5, 12
56:22		258:12	32:3, 18, 23	
60:10		269:11		

## EASTERN PROFIT CORPORATION LIMITED vs STRATEGIC VISION US, LLC

J. Michael Waller on 02/08/2019

Index: discussions..dollars

170:5	<b>disposed</b>	<b>divisions</b>	229:3,13,
191:21	150:1	24:22	23,25
198:11	151:19	132:5,6	230:2,4,6,
202:19	<b>disposing</b>	<b>divulged</b>	8 231:6,7
230:10	150:11	34:19	232:13
232:8	<b>dispute</b>	<b>divulging</b>	233:8,18
<b>discussions</b>	23:22	82:13	236:8
48:24	<b>disrupting</b>	108:23	237:24
109:6	25:4	<b>document</b>	255:6,8
110:20	<b>disruption</b>	17:21	259:3,6
135:25	25:12	18:12,18,	261:17,22,
136:2	<b>dissatisfactio</b>	22 19:14,	23 262:14
139:18	<b>n</b> 273:25	16 20:15	264:1,8
170:9	274:1	46:15 53:1	267:4,10
228:15	<b>dissatisfied</b>	98:14	268:1,4,19
233:22	216:14,19	105:13,17,	269:18
252:2	274:8	22 106:11	270:2,21
273:12	<b>disseminate</b>	113:5,7	271:1
<b>disk</b> 202:15	189:9	149:20	283:1,8,23
203:20	<b>dissident</b>	154:14,16,	284:2,8
<b>dismissed</b>	108:8	17,20,23	<b>documentation</b>
63:19	<b>distinction</b>	164:6,13,	40:14
<b>dispatch</b>	253:21	16,22	177:19
168:9	<b>distributed</b>	165:17,18	184:14
<b>dispatched</b>	87:24	166:15	<b>documents</b>
82:15	<b>dive</b> 82:24	169:17	178:22
185:25	276:8	177:12	179:11,18
<b>dispense</b>	<b>dives</b> 67:7	189:17	185:17
161:22,23	<b>dividing</b>	190:1,12	234:1
<b>displayed</b>	45:18	191:4	259:7
177:20	<b>division</b>	195:14	268:21
179:12	17:2	212:20	269:12
<b>dispose</b>		213:5	281:1
23:16		226:2,5,15	282:17
150:12		227:4,14,	<b>dollars</b> 39:7
		22 228:10,	45:12
		13,25	139:14,21

## EASTERN PROFIT CORPORATION LIMITED vs STRATEGIC VISION US, LLC

J. Michael Waller on 02/08/2019

Index: domain..Eastern

140:9	47:2, 4, 7	208:23	248:13, 21
157:14	149:16, 25	213:8	249:10
161:3, 4	150:2	215:7	273:12
186:18	226:15, 17	216:12, 22	277:14
259:20	230:4	<b>driver's</b>	<b>early</b> 11:13
<b>domain</b>	264:3	181:4	12:3, 8
181:16, 18	<b>drafted</b> 33:2	<b>drives</b>	21:25
230:24	47:3, 9	87:17, 22	37:11
<b>domiciled</b>	53:12	165:13, 21,	166:24
286:9	89:3, 7	23 166:1, 7	167:7
<b>door</b> 170:4	230:6	176:4	193:23
173:1, 3	<b>drafting</b>	195:4	194:6
206:10	32:16	212:6	221:5
<b>doorstep</b>	74:25 98:1	<b>due</b> 37:5	264:14
170:2	<b>drafts</b> 19:6,	<b>dug</b> 61:21	<b>earnings</b>
<b>DOS</b> 172:7,	24 20:2, 5,	80:5	44:10
18	9, 17	<b>duly</b> 7:23	<b>ease</b> 108:5
<b>double</b>	150:3, 4	<b>duration</b>	<b>easily</b>
137:19	<b>draw</b> 228:17	95:21	247:22
183:8	<b>drill</b> 17:18	<b>dynamics</b>	<b>East</b> 112:24
<b>double-check</b>	52:10	268:12	246:11
73:4	<b>drive</b> 56:5	269:23	<b>Eastern</b> 7:4,
<b>doubt</b> 140:8	58:8, 11		16 8:5
160:24	59:14 64:7	<hr/> <b>E</b> <hr/>	13:13
184:23	65:9, 18	<b>earlier</b>	28:19 48:2
250:23	68:1 88:5	13:20 19:6	52:25
<b>downtown</b>	89:20	42:5 46:24	53:1, 3
231:20	165:4, 6,	90:24 91:2	55:12
<b>draft</b> 19:15,	15, 17, 19,	123:21	63:5, 6
22, 24, 25	24 176:16,	171:19	74:18 75:8
20:15, 18	24 192:10	177:25	79:11
21:13, 16,	194:24	215:7	84:24
17 22:4, 5,	197:4	234:13	88:20
24 46:23	200:10	235:7	96:12
	202:6, 24	244:15	98:13
	203:12		99:21, 25



## EASTERN PROFIT CORPORATION LIMITED vs STRATEGIC VISION US, LLC

J. Michael Waller on 02/08/2019

Index: Eastern's..end

100:1,2,6,	<b>edit</b>	68:15,	263:3	273:21
10,14,19	18		<b>election</b>	<b>employ</b> 250:9
101:3	<b>edited</b>		248:19	<b>employer</b>
104:4	266:19		<b>electronic</b>	10:2,3
105:14	<b>editorial</b>		47:23	<b>employment</b>
118:4,9	146:10		64:22 68:9	27:5
124:14	<b>educational</b>		81:12 85:2	<b>enable</b>
136:24	9:5		88:11	137:10
159:15	<b>effect</b> 40:14		128:12	<b>encompass</b>
160:25	77:10		150:6,7	89:24
161:11,12,	131:8		169:5,8	<b>encounter</b>
16,20	191:25		191:8	90:19
188:13	208:1		200:22	<b>encountered</b>
189:2	<b>effective</b>		202:12	178:11
195:18	243:8		208:22	183:22
197:8	251:5		216:11	260:7
208:18	<b>effectively</b>		253:10,22,	<b>encounters</b>
217:6	38:24		25 288:4,	84:25
247:14,15	94:18		6,11,12	<b>encrypted</b>
264:25	206:19		87:24	151:13,17
270:7,22	<b>effectiveness</b>		88:16	213:22
271:1	240:20		<b>elevator</b>	214:3,6,10
272:7,24	<b>efficiency</b>		206:10	<b>encryption</b>
274:4	283:3		<b>Ellman</b> 7:15	81:20
286:1,9	<b>efficient</b>		<b>else's</b>	<b>end</b> 36:17
287:6	276:7		226:11,12	37:5,18,22
<b>Eastern's</b>	<b>efficiently</b>		<b>email</b> 81:13	69:2 92:6
261:1	281:13		167:21	101:17
<b>easy</b> 147:24	<b>elaborating</b>		173:2	120:3
196:3	233:22		213:22,25	133:9
<b>eat</b> 203:23	<b>elected</b>		214:13	192:4
207:9	138:4		<b>emailed</b>	238:5
<b>eating</b> 204:1	241:13,20		81:16	252:23,24
<b>eccentric</b>	242:3,5		<b>emphatic</b>	259:23
244:4				
<b>echo</b> 242:1				

## EASTERN PROFIT CORPORATION LIMITED vs STRATEGIC VISION US, LLC

J. Michael Waller on 02/08/2019

Index: end-to-end..Europe

276:21	261:12	164:6	<b>essential</b>
278:17	262:1	233:8	27:25
281:14	285:1	261:17	<b>essentially</b>
<b>end-to-end</b>	<b>engagements</b>	<b>entity</b> 28:25	206:25
81:19	84:5	74:23	224:16
<b>endanger</b>	<b>engaging</b>	75:15 76:6	243:5
131:20, 23	260:25	100:21	262:24
132:14	<b>English</b>	161:20	<b>establish</b>
<b>endangered</b>	54:8, 13,	285:6, 20	155:11
132:11	18, 20	<b>environment</b>	159:1
<b>ended</b> 62:1	142:19	23:19 56:4	<b>estate</b>
86:3	159:25	279:8, 16	30:14, 16
122:12	160:1	<b>environments</b>	31:13
127:17	178:18	278:19, 25	231:12
196:16	231:10	<b>envision</b>	<b>estimate</b>
258:12	<b>ensure</b>	252:20	257:5, 6
<b>ends</b> 89:13	144:6, 7, 8	<b>envisioned</b>	<b>estimates</b>
90:25	<b>entail</b> 55:16	68:7	232:15
<b>enforcement</b>	57:25 67:5	<b>equipment</b>	<b>Estonia</b>
148:13	<b>entailed</b>	42:17	110:1
<b>engage</b>	52:12 76:8	45:24	<b>euphemism</b>
229:5, 19	<b>entered</b>	<b>equivalents</b>	217:13, 14
231:12	285:6	97:13	<b>Eurasian</b>
<b>engaged</b>	<b>enterprise</b>	<b>Erik</b> 115:9,	244:19
260:22	247:21	13	245:19
<b>engagement</b>	<b>entire</b> 144:9	<b>Erin</b> 7:19	<b>Europe</b>
44:13, 17	236:8	281:18	65:12, 15
45:4, 17, 19	<b>entities</b>	<b>erratic</b> 61:9	68:1 72:4
84:3	9:22 75:4,	<b>error</b> 84:14	174:21
148:10	7, 11 98:16	<b>escape</b> 159:8	176:20
167:2	107:16, 18	<b>escrow</b>	186:1
175:12	159:10	139:22	192:21
225:16	241:4, 10	<b>essay</b> 56:2	210:2, 10
258:12	<b>entitled</b>		264:13
260:4, 14			272:3

## EASTERN PROFIT CORPORATION LIMITED vs STRATEGIC VISION US, LLC

J. Michael Waller on 02/08/2019

Index: European..expense

<b>European</b>	<b>examine</b>	62:24	276:12
58:10	281:3	63:10	282:20
176:1,2	<b>examples</b>	64:15	283:24
<b>evade</b> 223:2	252:13	88:23	287:24
		99:19	
<b>evaluate</b>	<b>exceed</b> 82:9	100:22	<b>exhibits</b>
85:3,25	<b>excellent</b>	112:3	273:12
86:2	118:24	115:16	281:9
<b>evenly</b>	162:25	194:13	<b>exile</b> 156:4
38:19,21	<b>excited</b>	<b>exhibit</b> 18:6	<b>exiled</b> 108:8
<b>event</b> 10:22	270:5	46:11,24	244:4,17
84:2 97:13	<b>exclusively</b>	47:5,6,8,	245:13
	148:16	17,20	<b>exist</b> 179:5
<b>eventually</b>	216:9	105:13	<b>existence</b>
161:8	<b>excuse</b> 118:2	113:5	84:20
191:11	206:22	116:8	140:2
<b>Evermay</b>	236:16	164:4,5,6	144:19
231:16		165:7	145:23
<b>Everybody's</b>	<b>execute</b> 75:6	176:11	<b>exists</b>
56:14	76:15	186:12	154:9,20
<b>evil</b> 137:6	145:9	212:16,17	
	150:13	214:2,25	<b>expect</b> 44:11
<b>exact</b> 24:8	151:3	226:2	45:1,9
46:25	216:2	229:23	61:10
107:20	<b>executed</b>	233:8	196:16
157:16	98:6	234:4	<b>expectation</b>
166:12	131:7,10	236:6,14,	60:23,25
199:12	164:24	16,17,23	
<b>exaggerate</b>	166:11	237:9,21,	<b>expected</b>
187:1	168:22	23 248:13	71:14
<b>exaggerating</b>	272:13,23	255:6	<b>expecting</b>
135:5	<b>executing</b>	259:3	121:18
	46:3 114:4	260:15	199:25
<b>examination</b>	<b>execution</b>	261:17	<b>expense</b>
8:1 280:23	51:20 57:4	263:20	94:17
281:15	59:17	265:14	223:18
282:23		267:4	
		270:20,21	

## EASTERN PROFIT CORPORATION LIMITED vs STRATEGIC VISION US, LLC

J. Michael Waller on 02/08/2019

Index: expenses..fact

<b>expenses</b>	258:18	<b>exploded</b>	172:6
39:13	269:25	205:4,6	262:19
42:2,18,22	272:19	<b>exploit</b>	<b>extra</b> 95:10
45:20,21	279:1	24:22,25	280:24
223:8,19	<b>explained</b>	88:7	<b>extraordinary</b>
<b>expensive</b>	28:4,10,14	246:23	34:21
125:9	51:22	<b>explore</b>	<b>extremely</b>
<b>experience</b>	76:25	231:12	34:13,24
9:19 68:14	173:7	<b>expose</b> 25:5	56:23
69:22	174:15	139:13	60:16
115:15	186:16	140:2,4	<b>eye</b> 243:18
123:1	202:22	242:8	
125:4	204:14	<b>exposing</b>	<hr/> <b>F</b> <hr/>
228:8	213:18	248:14	<b>fabricate</b>
274:22	269:3	249:3	80:7
279:15	273:11	<b>exposure</b>	<b>face</b> 89:9
<b>experienced</b>	275:15,16	140:5	209:14,15
51:8	<b>explaining</b>	270:1	<b>face-to-face</b>
<b>expert</b>	51:23 62:6	<b>express</b>	200:15,16
142:25	97:5	204:25	<b>facilitate</b>
143:3	<b>explains</b>	<b>expressed</b>	251:24
<b>expertise</b>	126:17	34:14,15,	<b>facilitating</b>
15:6	<b>explicit</b>	17 140:8	162:4
<b>explain</b>	36:11 87:5	160:23	<b>facilitator</b>
14:13	95:22 97:9	275:6	21:19
24:20 27:8	99:1	<b>extensive</b>	148:4
28:18	145:16	216:24	<b>fact</b> 51:23
29:4,10,	275:1	<b>extensively</b>	80:12
13,20 52:1	<b>explicitly</b>	17:12	108:25
87:25	27:17	<b>extent</b> 32:17	109:3
112:7	51:22	33:9 44:3	160:5
170:24	93:15	90:21	170:19
172:21,24	97:18	140:6	209:25
195:23	128:9	144:24	214:14
205:18,22	274:18		
212:12	285:19		

## EASTERN PROFIT CORPORATION LIMITED vs STRATEGIC VISION US, LLC

J. Michael Waller on 02/08/2019

Index: faction..financial

<b>faction</b>	178:20,25	216:3	<b>field</b>	68:14
183:9	179:12	217:11,15,	69:22	
	180:8	23,25	73:24	
<b>factions</b>		218:5,11	<b>fight</b>	137:6
156:2	<b>familiar</b>	222:15	<b>fighter</b>	
<b>facts</b> 79:21	213:1	260:21	138:12,23	
<b>fail</b>	<b>familiarity</b>	264:14	<b>fighting</b>	
122:14,17	54:1	265:2,7	227:9	
126:10	<b>familiarize</b>	289:4	<b>figure</b>	41:9
<b>failed</b> 90:8	18:14	290:8	91:24	
<b>failing</b>	<b>families</b>	<b>federal</b>	130:21	
90:12	268:6	180:13	181:12	
<b>fails</b> 90:6	<b>family</b> 25:5	184:1,4,9,	<b>figured</b>	
<b>failure</b> 44:7	146:1	25 185:3,	138:20	
45:6	148:12	6,14	<b>figures</b>	
<b>fair</b> 17:19	238:7	<b>feedback</b>	254:25	
33:5 59:6	268:2	217:20	<b>file</b> 186:18	
73:19 81:4	<b>fast</b> 94:2	231:4	219:17	
88:16 90:3	<b>fear</b> 34:14	268:22	<b>filed</b> 284:5	
167:1	<b>feasibility</b>	<b>feel</b> 11:12	<b>files</b> 64:22	
268:13	88:10	131:19	192:11	
284:11	<b>feasible</b>	132:15	202:7,12	
286:14,24	170:12	142:17		
<b>fake</b> 79:19	<b>February</b> 7:6	209:14	<b>fill</b> 47:11	
161:20	93:25 94:1	<b>feelings</b>	<b>filled</b> 18:20	
178:22	95:3,20	104:12	<b>filter</b> 144:6	
179:4,18	102:6,16	<b>fees</b> 46:2,	<b>final</b> 36:16	
<b>Fakhravar</b>	103:20	4,8 117:21	220:5	
155:7	104:21	<b>fellow</b>	275:10	
<b>fall</b> 114:3	133:15	104:16	<b>finally</b>	
<b>false</b> 69:9,	143:22	115:9	222:13	
15 71:16,	144:2	<b>Ferrari</b>	<b>finance</b> 36:2	
25 80:11,	180:1	125:11	<b>financial</b>	
13 89:14	183:13	<b>fiction</b>		
91:20	215:1,19	161:22,24		

## EASTERN PROFIT CORPORATION LIMITED vs STRATEGIC VISION US, LLC

J. Michael Waller on 02/08/2019

Index: find..force

33:17	254:24	265:14	<b>flown</b> 192:20
37:2,15	<b>fingerprints</b>	266:4	<b>fluent</b> 54:9
38:15	221:24	287:24	86:5
52:13,25		<b>fit</b> 12:17	<b>fly</b> 176:20
53:8 55:1,	<b>finish</b> 8:11	<b>fits</b> 251:21	210:2,12
9 60:6	61:4 94:22		
117:15,18	177:9	<b>flag</b> 174:14	<b>flying</b>
<b>find</b> 14:18	<b>finished</b>	183:11	246:20
36:24 50:8	56:1 61:3	<b>flash</b> 56:5	<b>focus</b> 123:17
60:11,12,	<b>finite</b> 253:5	65:18	136:5
16,18	<b>Finland</b>	<b>flat</b> 95:14	<b>focusing</b>
70:7,13	245:4	96:15,17	69:24
71:3,15		97:11	<b>folks</b> 159:14
79:20	<b>firm</b> 73:21		183:22
89:14	83:1,6,7	<b>flat-rate</b>	185:3,10
92:24	266:16	37:5	191:11
94:4,6	<b>firms</b> 104:15	<b>flaws</b> 156:15	
96:1 180:2	<b>firsthand</b>	<b>Fletcher</b>	<b>follow</b> 40:19
181:20	154:3	266:17	53:6 61:5
183:16			121:14
221:3	<b>fish</b> 48:1,	<b>flew</b>	230:7
237:14,15	5,10,14,19	210:10,20	288:18
260:21	50:13,14,	211:6	
266:5,6	18,22 51:2	<b>flight</b>	<b>follow-on</b>
<b>finding</b>	64:23	210:16,17,	232:13
71:24 95:7	66:20	21 213:9,	<b>follow-up</b>
	95:19,20	17	48:8
<b>fine</b> 13:22	96:5 97:3,		193:18
23:7 29:3	14,15,16	<b>flights</b>	<b>followers</b>
51:6 54:11	164:19	199:17	250:6
66:14 87:9	179:8	219:12	
88:17	180:5,7	<b>flip</b> 190:1	<b>food</b>
90:16	181:13		203:23,25
101:22,24	190:19	<b>floor</b> 201:22	<b>force</b> 156:13
112:21	192:12	<b>flounder</b>	170:11
164:12	202:8	48:17	173:20
173:13	214:19	<b>flow</b> 89:8	174:2
207:23	237:3,19	273:8	



## EASTERN PROFIT CORPORATION LIMITED vs STRATEGIC VISION US, LLC

J. Michael Waller on 02/08/2019

Index: Forces..full

<b>Forces</b> 11:19	<b>forward</b>	<b>French</b> 10:8,	201:12
	278:5	20,24	208:4
<b>foreign</b>		11:15 12:2	218:7
53:18	<b>fought</b> 138:9	15:25	223:13
115:20	<b>found</b> 63:2	16:23 17:1	226:18,19
116:2	69:2,8,14	20:12,13	227:2
175:22	70:1,8	21:20	230:16
<b>forensic</b>	72:13	25:21	232:2
33:17	80:8,12,18	26:1,11	254:23
52:13,25	131:4	31:6,12	264:13
53:8 55:2,	132:10	38:18	265:1
10 60:6	136:10	39:18	266:19
<b>forensics</b>	160:8	44:12	283:12
88:4	168:5	46:21	289:7
	178:8	51:11	
<b>forever</b>	179:11,19	63:15	<b>French's</b>
252:22	180:11,12	72:24	154:16
253:5	182:9	105:23	222:23
<b>forged</b> 180:9	<b>foundation</b>	114:3,18	226:13
<b>forgeries</b>	31:18,19,	116:23,24	228:12
179:14,20	22 250:25	117:7	<b>friend</b>
<b>forgery</b>	<b>foundational</b>	137:4,12	118:18
179:16	268:14	147:23	119:8,11,
<b>Forgive</b>	<b>foundations</b>	152:23	12 120:7,
107:25	251:5	153:3,12,	11 138:1,6
<b>form</b> 20:23	<b>Fox</b> 243:16	15 154:5,	<b>friends</b>
47:23	<b>Frank</b> 70:8	13 158:8	163:13,17
57:11,12	<b>Frankfurt</b>	160:9	249:2
67:12	210:18,19	161:11	<b>front</b> 170:4
137:1	<b>fraud</b> 267:17	165:5,7,	173:1
<b>formal</b> 37:19	269:16	13,14,20	<b>frustration</b>
<b>format</b> 66:4	<b>free</b> 138:11	167:13	136:4
<b>forms</b> 81:12	207:5,23	182:13,14	205:1
<b>fortune</b>	<b>freer</b> 246:15	189:21	<b>fulfill</b> 34:9
131:24		190:16,18	<b>full</b> 8:20
		193:13	55:11
		194:1,2	
		198:6,9	

## EASTERN PROFIT CORPORATION LIMITED vs STRATEGIC VISION US, LLC

J. Michael Waller on 02/08/2019

Index: fully..giving

90:25	<b>garbage</b>	<b>generic</b>	226:24
91:7,11	142:3,4	119:13	<b>get all</b>
257:1	205:9	<b>gentleman</b>	36:10
262:24	<b>garbage'</b>	244:11	<b>Ghost</b> 259:12
273:14	142:5	<b>genuine</b>	<b>gift</b>
<b>fully</b> 44:3,4	<b>gathering</b>	79:15,24	232:18,19,
133:3	253:10,22	80:3,10	21
237:13	<b>gauge</b> 88:5	<b>genuineness</b>	<b>gifts</b> 232:24
<b>fund</b> 260:17	<b>gave</b> 56:24	80:17	<b>gigabytes</b>
285:7	65:18	<b>GEOINT</b>	183:18
<b>funding</b>	69:9,12	262:10	211:14,25
98:25	76:14	<b>geometric</b>	212:23
<b>funds</b> 25:10	113:8	262:5	213:19
36:9 41:24	166:16	<b>George</b> 9:7	<b>gigs</b> 211:20
42:7,21	168:13	<b>Georgetown</b>	<b>give</b> 18:4
43:24	176:14	31:23	19:17 22:3
55:22	191:8	39:19,20	44:7 45:7
99:15,17,	192:4	41:22	59:1 93:24
18 137:10	194:1,3	114:1,6,	95:7 123:7
141:11	206:10	20,21	179:24
<b>future</b> 45:3	219:9	231:17	184:14
173:9	235:6	<b>Geospatial</b>	199:4
	255:17	262:11	207:4
	258:6	<b>Germany</b>	208:8,17,
<b>G</b>	261:25	175:18	21,25
<b>G-A-L-I-N-A</b>	<b>gear</b> 273:13	210:16,18,	215:8
146:20	<b>general</b>	21 211:4	219:15
<b>G-R-E-G-G</b>	11:20	213:16	225:22
137:25	33:12	272:4	228:25
<b>gain</b> 237:24	73:24	<b>Gertz</b> 25:22	232:18,20,
<b>gained</b> 25:10	<b>generally</b>	26:9,10	24 258:2
<b>Galina</b>	30:1 72:24	117:2,4,5,	<b>giving</b> 56:20
146:18	109:23	11 162:2,9	113:18
<b>game</b> 132:4	164:15	163:3,9,17	118:24
233:23	187:25		123:12

## EASTERN PROFIT CORPORATION LIMITED vs STRATEGIC VISION US, LLC

J. Michael Waller on 02/08/2019

Index: global..guidance

164:10	182:6	40:15, 21	182:5, 18
215:8	183:8	41:1 46:10	222:4
<b>global</b> 7:9	184:1, 4	52:4 74:4	242:4
230:25	185:3, 6, 14	87:7, 9	243:1, 2, 4
253:10, 22	221:17	96:11	248:18, 22
<b>globe</b> 262:6	230:25	105:5, 12	252:1
<b>go-to</b> 167:3,	239:21	106:13	256:22
4	240:18	113:4	278:17
<b>goal</b> 25:15	241:19	116:7	<b>groups</b> 9:13
254:8	258:21	152:13	109:9, 14,
<b>goals</b> 228:24	<b>governments</b>	154:19	19 110:3,
<b>good</b> 7:1	73:2	157:1	9, 22
8:3 15:1	<b>grad</b> 9:16	164:5, 9	111:12, 16
19:21	<b>graduated</b>	169:16	115:24
47:24	9:10	175:10	240:21
87:12	<b>grassroots</b>	196:19	249:24
93:22	240:11	206:22	<b>guarantees</b>
105:25	<b>grateful</b>	212:16	79:14
113:12	207:3	214:24	<b>guerilla</b>
133:3	<b>great</b> 26:13	226:1	138:23
142:19	56:14	229:22	<b>guess</b> 28:6
155:19	137:7, 8	233:7, 13	46:2, 4
243:7	191:14	255:5	102:21
272:10	<b>greater</b>	259:2	116:4
281:17	160:20	263:19	134:5
<b>gorilla</b>	<b>Greg</b> 138:1	267:3	146:16
251:20	<b>Gregg</b> 137:24	270:10, 19,	172:13
<b>gotta</b> 93:17,	<b>Grendi</b> 7:14	24 279:18	239:9
18 277:24	8:2, 4 10:3	280:22	260:2
<b>government</b>	17:25	282:15, 24	<b>guessing</b>
25:4 73:1,	18:10	283:2	39:22, 23
19 137:5	20:1, 20	286:21	160:12
156:4, 20	21:6 22:20	289:20, 24	217:23
159:3	33:5 35:16	<b>ground</b> 8:10	<b>guest</b> 155:20
181:2		<b>group</b> 77:10	<b>guidance</b>
		92:20	
		156:7	

## EASTERN PROFIT CORPORATION LIMITED vs STRATEGIC VISION US, LLC

J. Michael Waller on 02/08/2019

Index: Gulag..Guo's

183:15	104:1, 8,	20, 25	224:10
<b>Gulag</b> 53:20	14, 24	149:2, 4	226:20
<b>Guo</b> 19:15	106:15, 22	152:18	227:2, 19
20:11	107:13	153:23	228:6, 19,
23:23, 25	108:20	156:9	25 229:5,
24:4, 8	109:8	158:23	10, 11, 19
26:16, 17,	110:12, 19	159:18, 22,	230:9, 12,
21 27:8, 15	111:18	25 160:4	17 231:24
28:4, 10, 21	112:12, 22	161:15, 18,	232:18, 20
30:7, 13, 21	113:19	21 162:21	233:21
31:3, 13	115:17	167:5, 10,	242:17
32:2, 4, 12,	117:2, 3, 12	12, 23	243:18
24 34:1, 8	118:5, 9,	168:18	247:14, 15,
35:7 38:12	20, 21	169:20	25 252:5
43:16	119:16	171:9, 14	254:10, 11
44:10 45:5	120:12, 25	173:4, 14,	255:3
48:23	124:14, 17,	19 174:12	260:17
51:19, 23	23 128:6,	181:11	261:9
54:3, 5, 8,	8, 13 129:1	186:15, 17,	263:6
13, 23	130:14, 16,	25 188:13,	264:18, 25
56:6, 19	21, 24	15 189:2	265:5
57:2, 15	131:5, 17,	191:13	267:18
58:12, 16	22, 24	193:20	268:23
59:16	133:6, 12,	194:11, 17	269:2, 10
62:7, 17, 18	16, 23	195:12, 18	270:7
63:6, 7	134:1, 22,	196:2, 7, 16	271:18
68:2, 16	23 135:2,	201:13	273:19
71:10 72:6	4, 5, 15	202:22, 24	274:4, 11
76:14	136:4, 5, 6,	203:5, 14	275:1, 20
81:16	9, 22, 25	204:18	276:22
85:19	137:12	208:18	277:12
86:12	139:19	209:11	280:13
87:19	140:5	216:14, 19,	284:18
98:25	143:4, 5, 20	21 217:6	285:4
100:21	144:12	218:18	<b>Guo's</b> 24:11
102:12, 19	146:13	219:25	26:7 31:1
103:25	147:16	220:14	33:10
	148:3, 5,	222:11	37:11

## EASTERN PROFIT CORPORATION LIMITED vs STRATEGIC VISION US, LLC

J. Michael Waller on 02/08/2019

Index: guy..heard

38:10	<b>hackers</b>	<b>hand</b> 60:24	<b>happen</b> 46:9
44:23 48:6	224:20	104:18	145:8
54:6,7	225:9	169:10	148:23
67:23	242:5	202:15	<b>happened</b>
99:16	249:10	217:2	12:12
103:6	<b>haggle</b>	219:21	190:23
128:10	257:16	234:9	206:7
134:11		<b>handed</b>	<b>hard</b> 8:15
148:6	<b>haggling</b>	165:12	21:10
168:25	123:11	176:16	152:13
174:17	<b>half</b> 39:1,4	202:17,18	223:17
213:23	157:13	203:12	225:15
217:7	<b>half-million-</b>	211:25	241:6
221:23	<b>dollar</b>	229:3	
238:4	158:4,7		<b>harm</b> 78:7
261:2	160:3	<b>hanging</b>	<b>harvest</b>
265:22		203:20	253:25
267:12	<b>Hampshire</b>	<b>handout</b>	<b>hate</b> 241:18
273:23	137:25	262:2,3	<b>he'll</b> 137:2
<b>guy</b> 70:8	<b>Han</b> 20:12	<b>hands</b> 87:14	<b>head</b> 178:6
120:21	21:19	<b>handshake</b>	208:13
123:17,18	25:21	78:14,15	265:18
167:3	26:4,14	<b>handwrite</b>	<b>hear</b> 153:18
240:22	31:3	22:8,9	157:23
<b>guys</b> 49:21	53:16,17	<b>handwriting</b>	158:6
121:15	96:2	105:21,24,	161:10
139:1	102:17	25 189:19,	182:13
167:4	116:14,16,	22,23	204:16
182:22	25 117:2,	190:15,17	220:23
203:19	12,14	226:8,10,	288:24
	118:3,8,	13	289:3,6
	14,16	<b>handwritten</b>	<b>heard</b> 25:14
<b>H</b>	119:7,20	22:12,15	49:14,17
<b>H-A-N</b> 26:5	120:13	105:13	100:1,10
<b>habit</b> 150:12	126:2,5	154:7,12,	131:1,11
<b>hack</b> 167:17	168:19	22 190:2	154:3,4
	<b>Han's</b> 121:22		

## EASTERN PROFIT CORPORATION LIMITED vs STRATEGIC VISION US, LLC

J. Michael Waller on 02/08/2019

Index: hearing..ID

161:5	30:16	213:17	how's 158:4
167:1	<b>high-risk</b>	<b>homestretch</b>	<b>how's-it-</b>
180:24	23:19 78:6	270:11	<b>going-type</b>
220:20			163:14
270:7	<b>higher</b> 17:13	<b>honestly</b>	<b>Hudson</b>
280:10	<b>hire</b> 15:12,	123:23	250:25
286:5	19 54:4	<b>Hong</b> 99:2	
289:7	122:22	125:19	<b>hug</b> 192:4
<b>hearing</b>	130:21	157:14	206:11
153:25	148:20	158:21	<b>huge</b> 93:16
158:14	243:5,6	240:9	171:6
285:11	249:8	285:21	192:4
		286:25	
<b>helped</b>	<b>hires</b> 142:24		<b>human</b> 47:23
112:25	<b>hiring</b> 249:9	<b>hop</b> 61:2	262:13
155:11,24	<b>historical</b>	<b>horrible</b>	<b>humanly</b>
248:18	52:14,25	245:25	94:12
<b>helpful</b>	53:9 55:2,	<b>host</b> 170:19	<b>HUMINT</b>
63:25	10 64:8,14	<b>hostile</b>	262:12
187:15	66:6,10,13	278:18,25	<b>hundred</b>
<b>helping</b>	70:22 71:6	279:6	16:11
109:9,12,	96:8	<b>hot</b> 87:16	259:20
14 156:11	<b>historically</b>	<b>hotel</b> 201:16	<b>hurt</b> 141:5
227:10	12:25	<b>hours</b> 151:25	<b>husband</b>
<b>hey</b> 91:22	<b>history</b>	176:23	10:10,13
103:2	9:11,12	203:21	17:8
161:16	104:13	204:4,5,6	<b>Huseby</b> 7:9
163:5	<b>hit</b> 278:19	231:3	<b>hypothesis</b>
181:11	<b>Hodgson</b> 7:19	281:6	221:19
185:21			<b>hypothetical</b>
<b>hide</b> 91:18,	<b>hold</b> 77:2	<b>house</b> 15:25	92:5,7
19	141:22	16:6 23:1	
<b>Higgins</b>	142:15	31:22,25	
163:19	<b>home</b> 20:6	112:3,9,11	
<b>high</b> 84:12	114:12	121:6,9	<b>I</b>
<b>high-end</b>	125:13	131:6	<b>ID</b> 187:5
	137:1	205:10	276:7



## EASTERN PROFIT CORPORATION LIMITED vs STRATEGIC VISION US, LLC

J. Michael Waller on 02/08/2019

Index: idea..incomplete

<b>idea</b> 26:13	<b>identified</b>	<b>imagine</b> 44:2	<b>in-person</b>
153:6,10,	235:2,20	50:3 78:8	104:22
16 159:18	237:3	<b>immediate-term</b>	160:14
181:10	<b>identify</b>	72:10	<b>inaccurate</b>
216:6	254:13	<b>immediately</b>	69:9
245:17	<b>identifying</b>	93:17	177:23
246:13,23	14:6 97:24	151:23	178:13
259:14		166:16	<b>include</b>
<b>ideal</b> 162:22	<b>identities</b>	176:21	33:17,20
	76:12,24	197:20	55:16
<b>ideas</b> 12:14	86:16	219:24	90:18
22:4	178:25	276:16	95:18
110:15,18	<b>identity</b>	<b>impatient</b>	147:4
124:5	78:10	51:25	171:5
148:5	84:20	56:19	248:25
227:7	101:14	209:4	<b>included</b>
228:16,18	279:11,21		58:18
248:12		<b>implied</b>	75:14
<b>identification</b>	<b>ideological</b>	27:15	177:22
18:7 46:13	137:13	28:25	247:11
105:15	<b>ideologically</b>	<b>importance</b>	<b>includes</b>
113:6	258:23	70:7	187:2
116:9	<b>illegal</b>	<b>important</b>	<b>including</b>
164:8	91:22	180:11	25:7 78:7
212:18	171:6,10	211:21	84:2
215:2	174:6	<b>impossible</b>	167:18
226:4	179:2	49:4 60:16	230:22
229:24	<b>illegally</b>	71:15 84:7	246:4
233:12	25:10	91:17	267:14
255:7	196:9	196:14,17	280:19
259:5	<b>illustrated</b>	241:8	<b>income</b>
261:19	246:12	276:1	101:24
263:22	<b>illustrating</b>	<b>impress</b>	<b>incompetent</b>
267:6	50:24	79:19	83:3
270:23	<b>image</b> 244:4	<b>impulsive</b>	<b>incomplete</b>
282:22		144:20	
283:25			

## EASTERN PROFIT CORPORATION LIMITED vs STRATEGIC VISION US, LLC

J. Michael Waller on 02/08/2019

Index: incorporated..information

97:20	33:13 34:6	60:16,18,	187:2,8,
<b>incorporated</b>	49:2 64:20	24 63:24	13,15
286:10,16	70:2 83:25	64:10,19	188:6,8,
287:7	86:13,25	67:25 68:9	11,12,14,
	97:22	69:9,11	22 189:3,
<b>incurred</b>	106:6,11	70:1,12	7,9 192:7,
223:6,8,18	178:3	72:7	16 193:16
225:15	179:16	73:12,19	194:4,14
<b>independent</b>	180:15	75:4	196:4,10,
28:7,9	181:1	79:14,19	15 198:17
	183:4	80:3,5,6,	202:14
<b>independently</b>	214:1	8,12,13,18	203:5
11:23	219:12	85:1 86:1	204:11,13
<b>indicating</b>	236:14,18	87:22	205:23
237:10	237:16	89:14,20	206:1,14
<b>indication</b>	241:1	113:16,18	208:18,23,
103:8	263:24	132:10	25 209:5
113:15	265:13,24	141:9,12	210:3
192:23	267:1,12	142:14	211:18
	270:1	144:9,15,	212:7,23
<b>indicative</b>	277:4	21,25	214:11,17,
91:3	287:13	145:1,11,	22 215:8,
<b>indirectly</b>		24 149:23	11,15
35:24	<b>individuals'</b>	163:21	218:16,19
	236:20	165:7,10	219:10,11,
<b>individual</b>	<b>industry</b>	169:10,19,	17 220:6
50:19	66:16	21,23	221:10,18
83:17	82:1,5	170:9	238:5
108:6,11	122:19	171:5	239:7,11,
119:14,18,		172:20	19,20,23,
25 123:20	<b>infiltration</b>	176:12	24 240:8
182:4,9	180:10	177:4,22	243:24
214:19	<b>influencing</b>	178:1,12	244:1
236:9,11	243:9	179:24	246:25
244:14		181:15,21	247:5
247:9	<b>information</b>	182:17,23	254:5
263:17	11:18	183:3	260:8
	17:17 50:8	186:11,12	268:24
<b>individuals</b>	56:22,24		

## EASTERN PROFIT CORPORATION LIMITED vs STRATEGIC VISION US, LLC

J. Michael Waller on 02/08/2019

Index: informed..interpreter

269:5,20	<b>insisted</b>	<b>insurgency</b>	<b>interested</b>
270:8	89:2	138:24	136:22
272:18	186:25	<b>integratable</b>	227:14
273:15	<b>insistent</b>	67:12	231:13
276:7,16	87:19	<b>integrity</b>	<b>interests</b>
277:24	<b>insisting</b>	205:7	104:10
287:20	173:20	<b>intelligence</b>	<b>interfere</b>
<b>informed</b>	<b>Institute</b>	17:6,8	231:1
80:13	9:15	34:23	<b>interfering</b>
202:21	250:25	36:24	281:10
284:17	<b>institution</b>	51:14 73:6	<b>interim</b>
285:4	251:9,15	99:6 117:5	156:20
<b>initial</b>	<b>instruct</b>	163:1	202:12
20:17,18	21:2 219:5	196:8	<b>interlocutor</b>
21:13	<b>instructed</b>	199:23	217:8
60:21	68:17 95:3	234:17	<b>intermediary</b>
117:11	102:18	253:10,22	77:18
128:16	133:16,23	261:18,21	162:23
163:11	143:18,22	11,13	<b>internal</b>
165:19	171:14	263:16	109:25
237:18	180:2	<b>intended</b>	110:2,16,
247:13,19	260:21	56:1	21 193:2
256:15	267:23	<b>intent</b>	245:14
<b>initialed</b>	271:18	274:17	<b>International</b>
46:20	<b>instruction</b>	<b>intercept</b>	9:15
<b>Initially</b>	99:16	88:1	167:20
55:20	217:12	<b>interest</b>	<b>internet</b>
<b>inside</b> 25:2	219:23	25:19,20	58:9 212:5
155:25	<b>instructions</b>	34:17	<b>interpreted</b>
168:14	67:24	70:10	143:5
170:23	<b>instructs</b>	233:2	<b>interpreter</b>
182:8	99:13	254:4	21:19
246:4,10	<b>insurance</b>	255:1	54:7,12
<b>insight</b>	120:8,14	265:21,22	
68:19			

## EASTERN PROFIT CORPORATION LIMITED vs STRATEGIC VISION US, LLC

J. Michael Waller on 02/08/2019

Index: interpreters..Iranians

<b>interpreters</b>	275:25	182:21	101:3, 5, 13
54:23			103:9
159:25	<b>invading</b>	<b>investigatory</b>	
	145:23	15:9 16:24	<b>invoicing</b>
<b>interpreting</b>	<b>invasion</b>	17:17	101:6
141:23	138:10	29:18 30:5	<b>involved</b>
<b>interrogatorie</b>	<b>invested</b>	35:12	22:10
<b>s</b> 282:21	30:13	49:19	30:16 36:9
283:4	242:21	52:11	42:8, 9
<b>interrogatory</b>	<b>investigate</b>	66:17	47:19
283:10	33:13	83:17	53:21
<b>interrupt</b>	224:3	108:11	69:10
206:23	<b>investigating</b>	114:7	86:24
<b>interruption</b>	146:11	156:8, 22	130:22
98:18	147:1	163:23	133:25
146:19	163:25	170:22	136:11
<b>interspersed</b>	<b>investigation</b>	252:9	142:16
190:3	14:21, 23	253:14	143:15
<b>intimidating</b>	15:3 16:20	<b>Investment</b>	152:18
282:17	108:15	167:21	168:8
<b>introduce</b>	146:3, 7	<b>investors</b>	183:10
7:11	163:20	104:16	219:13
119:20, 24	173:9	279:24	239:22
120:1	180:17	280:6, 8,	258:25
252:5	186:13	11, 12, 16,	263:16
<b>introducing</b>	187:10, 17,	20	275:20
118:9	19, 23	<b>invoice</b>	<b>involvement</b>
<b>introduction</b>	193:4	37:19	228:12
117:11	195:16, 20	100:25	<b>involves</b>
<b>intrude</b>	214:12	101:4	84:12
177:8	223:6	102:2, 22,	<b>Iran</b> 111:9
<b>intuitive</b>	<b>investigative</b>	25 103:2,	155:25
170:25	162:18	15 259:16	<b>Iranian</b>
<b>intuitively</b>	<b>investigator</b>	<b>invoiced</b>	155:9
	181:20	102:14	156:1
	<b>investigators</b>	259:19	<b>Iranians</b>
		<b>invoices</b>	156:16

## EASTERN PROFIT CORPORATION LIMITED vs STRATEGIC VISION US, LLC

J. Michael Waller on 02/08/2019

Index: Iraq..journalism

<b>Iraq</b> 11:5, 17	103:9,15 249:5	<hr/> <b>J</b> <hr/>	271:17 273:10 289:5
<b>Ireland</b>	<b>issues</b> 36:1	<b>jacket</b>	
174:23	43:15 50:7	125:8,9	<b>Japanese</b>
175:17,18	60:13		138:10
210:15,16, 20	83:19 89:18	<b>jackets</b> 125:10	<b>jargon</b> 49:18
<b>iron</b> 148:4	134:12	<b>January</b> 18:7	<b>Jaysun</b> 7:9
	136:13	46:22	<b>jeopardize</b>
<b>irregular</b>	146:13	47:4,15	144:18
88:18,22	158:17	65:1,19	
89:23	178:11	93:25	<b>jihadist</b>
90:7,17	179:7	95:18	11:8
91:1,3,5, 9,15 92:1, 9 93:4,11, 21 94:9	230:22 281:8	100:3	<b>jived</b> 137:3
127:9,10	<b>italics</b> 244:2	102:9,15 104:20 155:3 157:17	<b>job</b> 90:6,9 92:24,25 93:2 120:16
<b>IRS</b> 101:23	<b>Italy</b> 125:18	158:11	142:9
<b>isolating</b>	<b>item</b> 253:24	160:11	149:7
249:3	256:13	165:1,20 166:9,10	176:1 224:8
<b>issue</b> 37:19	<b>itemized</b>	176:25	249:14
69:3 84:23	248:13	177:1	258:22
85:21 87:7	<b>items</b> 33:25	183:19	
97:3 105:3	49:9 89:24	186:9,10	<b>jobs</b> 44:23
141:16	190:5	193:23	<b>Joe</b> 7:17
154:6	223:12	194:20,21	20:1 22:21
160:5	229:20	198:23	40:15
171:4	257:13,23	201:11,14	164:9
183:17,23	284:18	202:1	
186:23		203:2,11	<b>John</b> 8:22
233:14	<b>iteration</b>	204:9	136:17
265:10	184:12	206:20	<b>joint</b> 41:23
279:19	<b>itinerary</b>	207:1	114:3
	211:1	208:9,19	<b>journalism</b>
<b>issued</b>		215:12	164:2
102:3,25		221:5,8	

## EASTERN PROFIT CORPORATION LIMITED vs STRATEGIC VISION US, LLC

J. Michael Waller on 02/08/2019 Index: journalist..L-I-A-N-C-H-A-O

<b>journalist</b>	<b>Kai-shek</b>	120:17	<b>knowing</b> 81:7
162:18	138:13, 14	137:13, 19	153:25
<b>journalists</b>	<b>Kappa</b> 9:7	138:24	210:25
242:16	<b>keeping</b> 97:3	166:19	222:6
243:4, 23	136:4, 5	170:8	<b>knowledge</b>
<b>Judd</b>	<b>key</b> 240:12	172:1, 5, 10	32:11 54:4
137:22, 24	<b>Khodorkovsky</b>	177:4, 25	239:16
138:1	107:22	188:1, 5	269:21
<b>judge</b> 131:2	110:10, 13	190:2, 19	287:9
286:24	111:14	203:12	<b>Kong</b> 99:2
<b>judging</b>	244:13	208:25	125:19
149:19	252:6	229:16	157:14
183:6	254:24	243:2	158:21
<b>judgment</b>	<b>Khodorkovsky's</b>	244:8	240:9
124:19	252:20	248:23	285:21
142:13	<b>kid</b> 138:16	251:8	286:25
<b>jump</b> 281:13	<b>kids</b>	253:14	<b>Kraft</b> 182:19
<b>jump-starting</b>	278:11, 13	255:23	259:11
187:16	<b>kind</b> 11:21	257:5	<b>Krause</b> 7:15
<b>jumped</b> 12:9	12:15, 16	258:20, 24	<b>Kwok</b> 7:20
<b>junk</b>	14:8, 23	262:5	21:18 24:1
194:11, 15,	15:21	275:24	44:10
18 205:9	16:23 36:5	288:14	46:22
269:4, 6, 8	48:8 49:18	<b>kindergarten</b>	63:18
270:9	54:16	278:7, 10, 13	70:11, 16
<b>juvenile</b>	59:23	<b>kinds</b> 42:8	164:16
278:14	65:8, 17	78:8	183:7
	66:15	125:20	221:15
	68:5, 14	<b>King</b> 259:12	281:19, 22
<b>K</b>	69:23	<b>knew</b> 56:23	<b>Kwok's</b> 21:23
<b>K-H</b> 108:3	70:11 73:8	119:15	22:6 70:2
<b>K-O-D-O-R-K-H-</b>	74:1 84:6	131:11	<b>L</b>
<b>O-V-S-K-Y</b>	101:19	138:3, 19	<b>L-I-A-N-C-H-A-</b>
108:2	108:24	146:25	<b>O</b> 26:4
	109:17	275:25	
		276:2	

## EASTERN PROFIT CORPORATION LIMITED vs STRATEGIC VISION US, LLC

J. Michael Waller on 02/08/2019

Index: labor..legitimate

<b>labor</b> 17:2	179:1	191:9	<b>leaf</b> 265:15
53:20	<b>law</b> 73:21	192:7,9,20	<b>learn</b> 84:14,
<b>lack</b> 262:22	83:1	193:9,18,	16 287:21
<b>laid</b> 287:16	104:15	25 194:5,	<b>learned</b>
288:11	171:20	16,22,25	61:10
<b>land</b> 110:23	<b>lawsuit</b>	195:6	<b>leases</b> 45:25
<b>language</b>	216:6	210:22	<b>leave</b>
85:22	<b>lawyer</b> 77:3	211:3	101:11,12
86:4,6	97:25	213:18	221:21
108:6	118:2	221:9	<b>led</b> 83:23
<b>laptop</b>	<b>lawyerly</b>	244:17	<b>left</b> 42:7
169:2,4	199:24	255:12,17	43:24 44:8
202:15,24	<b>laying</b> 288:7	257:17	203:19
213:13	<b>layperson</b>	272:5	205:10
<b>large</b> 15:7	172:21	287:23	245:4
96:17	<b>lead</b> 38:5	288:2,21	<b>legal</b> 8:20
219:17	110:11	<b>leader's</b>	23:7
236:9	<b>leader</b>	255:14	45:14,24
246:8	77:19,23	<b>leaders</b>	46:2,4,8
273:8	78:4,5,9,	245:14	56:3
276:15	18,21	252:1	89:10,18
<b>larger</b> 34:10	79:4,8	254:3	91:21
36:8	80:5,17	268:7	99:11
104:10	83:13,23	<b>leaders'</b>	136:20
156:25	131:20	25:10	168:2,9,13
<b>late</b> 12:7	151:12	<b>leadership</b>	171:14
100:4,11	155:9	24:19,23	263:8
109:24	166:17,19,	25:13	<b>legalistic</b>
134:6	23 167:3	137:3	98:4
166:24	168:8,9,12	189:5	<b>legally</b>
232:4	174:15,20,	<b>leading</b>	75:16
281:11	25 175:4,	19:25	<b>legend</b> 262:8
<b>Latvia</b> 110:1	12 177:3	228:15	<b>legitimate</b>
<b>laundering</b>	178:13,15	240:22	77:4 79:21
	186:3,8	<b>leads</b> 71:13	



## EASTERN PROFIT CORPORATION LIMITED vs STRATEGIC VISION US, LLC

J. Michael Waller on 02/08/2019

Index: legitimately..lines

80:6	38:10	134:2,10,	267:19,20,
<b>legitimately</b>	51:20	11,20	24 268:16,
79:21,22	53:15,16,	135:1,4,8,	22 270:2
<b>Lego</b> 125:19	17 54:20,	14,22	271:21
135:7,13	22 57:3,16	136:14,22	273:20
<b>lengthy</b> 23:1	58:17	138:1,2,6,	275:1
<b>letter</b>	59:8,16	16,20	277:12
40:19,24	62:7,18	139:8,19	<b>Lianchao's</b>
214:25	63:7,17	140:11,22,	134:22
215:4,18,	81:17	25 141:17	137:4
23 222:16	86:5,21	143:8,25	<b>Liberty</b> 10:6
<b>letters</b>	96:2	147:24	41:19,21
236:10	102:17,22	148:15,20,	<b>license</b>
<b>level</b> 17:13	103:2,18,	24 149:1	181:4
49:11	22 104:3	152:19	<b>life</b> 133:20
71:12	105:2	159:24	139:2
97:4,6	106:16,23	160:4,7,	155:21
122:25	107:13	10,21	<b>light</b> 77:4
<b>leverage</b>	108:19	167:11,12	243:18
237:24	109:8	168:19	<b>lighter</b>
242:23	112:23	169:20	118:13,16
248:2	113:21,22	173:4	<b>like-minded</b>
<b>Lexington</b>	116:14,16,	178:9	254:8,9
9:2	25 117:2,	183:14,15	<b>likes</b> 187:1
<b>liaison</b>	9,12,14	187:1	247:25
67:23	118:3,8,	196:3	<b>limbo</b> 44:8
<b>Lianchao</b>	14,16	208:2,5	<b>limit</b> 253:5
20:12	119:7,20	216:1,5,9,	<b>limited</b> 7:4
21:18	121:22	13,19,21	262:18
25:21	123:24	217:4,7,14	<b>lines</b> 65:10,
26:4,14,16	124:17	218:8,21	13,14
27:9 28:4,	126:1,5,10	219:3	211:21
11 30:20	128:4,8,9,	226:19	212:15
31:3 35:24	21 129:18,	227:2,17,	213:20,21
	23 130:3,	18 228:16,	
	15 131:7	22 229:1	
	133:9,13,	230:11,17	
	17,19,21	265:6,21	

## EASTERN PROFIT CORPORATION LIMITED vs STRATEGIC VISION US, LLC

J. Michael Waller on 02/08/2019

Index: linguists..lower

261:3	<b>Lithuania</b>	<b>located</b>	257:7
<b>linguists</b>	110:1	15:24	286:6,8
85:16 86:7	<b>litigation</b>	<b>locations</b>	<b>loose</b> 241:13
256:21	7:10 265:8	187:5	243:1
<b>Link</b> 246:3	<b>litigators</b>	244:25	<b>losing</b> 148:7
<b>Linkedin</b>	73:22	<b>logistical</b>	209:13,15
113:14,15	<b>litmus</b>	89:18	<b>losses</b> 44:20
<b>list</b> 70:2	138:17	<b>London</b> 108:9	<b>lost</b> 116:18
106:7	<b>live</b> 86:23	125:20	<b>lot</b> 11:3
107:11	<b>lived</b> 25:8	239:3	23:13
164:18,19	201:22	244:17	61:24
179:8	<b>lives</b> 78:5	<b>long</b> 19:13	63:3,20,24
180:5,7	<b>living</b> 23:2	83:13	64:19 70:1
181:13	25:2 33:14	86:22	78:6 87:3,
183:25	137:7	93:20	5 93:1
184:4,19	204:23	94:14 97:6	104:24
188:13	249:13	101:23	110:19
190:19	<b>LLC</b> 7:5	116:16	124:5,6
213:23	39:17,19,	140:13,23	136:17
236:4	21 41:23	150:14	138:21
237:7	76:8	158:1	147:22
238:25	114:2,13,	163:13	169:19
267:12,14	19,22	195:23	209:7
269:15	<b>LLCS</b> 38:23,	207:22	248:3
<b>listed</b>	24 39:3,14	220:17	256:2
106:11	40:6,11	231:2	280:17
214:1	41:7,11,	272:8	281:7,9
265:14	14,25	<b>long-term</b>	<b>lots</b> 127:25
270:1	42:13,14	144:17	<b>loud</b> 278:2
287:24	43:11	206:3	<b>Loushin</b> 7:9
<b>literal</b>	117:19	<b>longer</b> 17:9	<b>lousy</b> 139:14
138:23	118:8	71:14	<b>low</b> 224:18
<b>literally</b>	222:22,23,	143:23	225:6
78:15	24 249:18	<b>looked</b>	<b>lower</b> 66:22
200:15		121:10	
		180:23	

## EASTERN PROFIT CORPORATION LIMITED vs STRATEGIC VISION US, LLC

J. Michael Waller on 02/08/2019

Index: lunch..material

189:14	<b>maintain</b>	<b>manage</b> 83:6	212:18
<b>lunch</b> 131:6	77:2	251:25	215:1
155:1	<b>maintained</b>	<b>managed</b> 25:9	226:3
157:1	17:10	<b>Mandarin</b>	229:24
204:24	<b>maintaining</b>	61:24	233:11
<b>luncheon</b>	27:25	85:7,9	255:7
157:5	<b>major</b> 134:9	86:6 128:6	259:4
	152:7,10,	178:16	261:19
<b>M</b>	17 153:1	<b>Mandarin-</b>	263:21
	154:1	<b>reading</b>	267:5
<b>M-I-K-H-A-I-L</b>	225:18	86:18	270:22
107:25	<b>make</b> 35:18	<b>Mandarin-</b>	271:1
<b>machines</b>	42:1 43:20	<b>speaking</b>	282:22
257:20	67:7 73:4	86:17	283:25
<b>made</b> 37:22	79:18	<b>markers</b>	
41:21	137:7	244:22	
42:13,14	141:11	<b>marketers</b>	
61:8 65:1	145:5,7	254:2	
78:12,13	159:2	<b>markings</b>	
87:23	177:16	190:7	
92:23	191:2	<b>marks</b> 113:8,	
124:3	239:20	11	
125:18	247:25	<b>MASINT</b>	
131:24	248:3	262:11	
142:3	249:13,16	264:21	
149:22	277:16	265:3	
222:1	281:1	<b>mark</b> 17:22	<b>mass</b> 250:6
284:19,20,	<b>makes</b> 90:5	191:2	<b>master's</b> 9:8
23	<b>making</b> 36:25	226:23	<b>match</b> 18:2
<b>MAGA</b> 241:17	60:25	<b>marked</b> 18:5,	262:9
243:2	68:10	7 33:24	<b>material</b>
<b>main</b> 144:5	152:21	46:12	61:24
180:12	<b>male</b> 203:3	105:14	76:14
202:8	212:3	113:6	85:2,22
236:9	<b>man</b> 247:25	116:9	209:8
241:2		164:7	211:10
			225:19

## EASTERN PROFIT CORPORATION LIMITED vs STRATEGIC VISION US, LLC

J. Michael Waller on 02/08/2019

Index: materials..member

246:16	141:11	<b>meet</b>	10:15	186:7
261:24	173:25	16:6	23:5	192:8,17,
274:15	180:3	26:15,16		24 193:18
<b>materials</b>	204:16	127:19,23		201:10,25
74:20 75:9	245:8	175:3,11		202:23
	253:25	176:6		203:10,24
<b>mathematically</b>	260:22	182:15		204:2,10,
94:13	288:15	186:3		19 206:7,
196:17		194:22		8,14,16
214:16	<b>meant</b> 24:21	210:21		208:2,9,19
	34:22 58:9	257:20		209:12
<b>matter</b> 7:3	120:13,15	282:2		211:24
8:5 81:18	139:24			226:20,24
124:16	172:22,25	<b>meeting</b>		227:5
163:3	177:17	21:22		230:9,13,
<b>matters</b>	280:5	22:23		14,21
63:20		23:1,12		231:2
<b>meal</b> 204:1	<b>measure</b>	24:10		232:6,11,
225:20	97:12	25:25 26:7		12,14
	<b>measures</b>	27:12,14		234:5,7,12
<b>meals</b> 224:2	34:20	30:4,18,		235:14
	45:25	19,25		272:3,4
<b>meaning</b>	256:1	31:14,15		
12:21	275:16	32:16,23,	<b>meetings</b>	
71:11		24 33:2,10	22:14 31:2	
127:8	<b>media</b> 32:1,2	34:2,5	37:8 54:21	
129:1	33:22	35:18,20	128:5	
151:9	52:22	37:7,10	135:12,16	
153:15	164:1	104:22	175:14,21	
181:2,23	230:25	125:14	194:15,25	
186:16	231:13	129:21	195:5	
195:10	241:25	135:8,10,	223:21	
212:4	249:4	13 153:23	285:18	
265:22	253:11	160:14		
	254:1,15	163:11	<b>member</b>	
<b>means</b> 14:14	276:17	167:15	130:17	
42:11		168:24	131:5	
79:18 81:6	<b>media/activist</b>	171:22,25	140:14,17	
99:12	240:11	174:19	148:11	
128:12	<b>medium</b> 272:1			

## EASTERN PROFIT CORPORATION LIMITED vs STRATEGIC VISION US, LLC

J. Michael Waller on 02/08/2019

Index: members..Michael

283:19	<b>mentioned</b>	215:21	25 192:1,2
<b>members</b>	23:23	218:23	194:12
52:21	116:15	219:1	195:2
69:17 73:5	152:4	272:8	201:12,22
77:17	165:21	276:11	204:4
83:22	168:7	<b>messages</b>	210:18
85:18	235:24	81:3	211:3
86:18	238:18	150:15,21	212:2
114:22	244:14	151:4,8,13	230:8
145:24	277:15	219:3	<b>metaphor</b>
146:1,11,	280:8	250:7	48:23 97:5
15 214:1	<b>mentor</b> 139:5	273:21	170:8
220:20,23	<b>mentored</b>	274:3	266:4
221:3	138:15,16	<b>messaging</b>	<b>metaphorical</b>
283:17	139:6,8,9	14:11 52:9	97:7
<b>memes</b> 249:1,	<b>menu</b> 118:19	108:12	<b>method</b> 95:5
12	<b>mercurial</b>	110:18	<b>methodical</b>
<b>memetic</b>	104:14	151:17	135:2
249:2	<b>message</b> 72:8	163:21	<b>methodologies</b>
<b>Memorandum</b>	80:25	164:3	95:1
98:10	81:11	254:5	<b>methodology</b>
<b>memorialized</b>	108:13	271:16	52:1,2
22:24	116:8	<b>met</b> 10:9,20	<b>methods</b>
127:1	118:24	24:14	16:25
149:18	119:7	25:17	73:11 81:8
234:24	120:18	30:21	82:11,12,
<b>memorializing</b>	126:1,6,9	31:9,10	17,18
238:4	128:12	38:12	91:21
<b>memory</b>	135:23	53:23	144:8
129:16	143:20	74:14	156:12
149:15	144:3	116:17	<b>metrics</b>
194:1	148:20	117:9	59:25
<b>mention</b>	151:14	148:9	<b>mic</b> 87:8
115:15	163:24	160:18	<b>Michael</b> 7:3,
149:10	200:13	174:15	
	201:1,5	175:1	
		191:22,23,	

## EASTERN PROFIT CORPORATION LIMITED vs STRATEGIC VISION US, LLC

J. Michael Waller on 02/08/2019

Index: micro-targeted..month

22 8:21,22	11:20,22	126:23	<b>money</b> 39:1,
<b>micro-targeted</b>	124:16	188:1	20 41:6
234:16	259:15	195:11	43:2 44:11
	278:18,25		45:11
<b>mid-december</b>	279:6,15	<b>ministry</b>	100:21
167:8		35:1 53:18	104:18
168:23	<b>milk</b> 125:10	132:2	158:18
230:15	<b>million</b>	<b>minor</b> 232:23	160:24
	36:2,5		171:6,10
<b>mid-february</b>	39:6 45:6,	<b>minutes</b> 74:5	179:1
220:11	12 121:6	<b>miscommunicati</b>	222:21
264:14	139:14,21	<b>on</b> 193:3,9,	224:15
267:23	140:9	12	225:5,10
<b>mid-january</b>	157:11,14	<b>misleading</b>	242:21
193:23	161:3,4	80:11	248:3,7
194:6	186:19,25	<b>missing</b>	249:16
273:10	251:7	57:13	257:1
<b>middle</b>	<b>millions</b>	<b>misspelled</b>	258:8
112:24	250:5	178:16	259:24
206:23			268:9
287:17	<b>mind</b> 50:23	<b>misstatement</b>	
	64:25	280:10	<b>monitor</b>
<b>migratory</b>	65:17		186:1
246:9	66:15	<b>mistake</b> 90:5	
	75:20 81:5	120:18	<b>monitoring</b>
<b>Mikhail</b>	89:24		186:7
107:22	96:20,22	<b>misunderstandi</b>	247:9
110:10,13	113:9	<b>ng</b> 196:3	253:12
244:13	121:22	<b>mix</b> 18:2	254:1
<b>Miles</b> 21:18,	133:2,6,24	<b>MMS</b> 34:25	<b>monopoly</b>
23 24:1	135:14	<b>mobilize</b>	240:2
44:9 46:22	172:5	240:12	
164:16	195:15	<b>modalities</b>	<b>month</b> 36:15
183:7	200:14	143:2	37:22
221:15	201:3		38:14
	207:11	<b>moment</b> 18:12	43:5,16
<b>Miles's</b>		138:5	67:1 89:11
222:7	<b>mine</b> 182:1	225:22	91:13
<b>military</b>	<b>minimum</b>		95:17,23,
			25 103:16

## EASTERN PROFIT CORPORATION LIMITED vs STRATEGIC VISION US, LLC

J. Michael Waller on 02/08/2019

Index: month's..Netherland's

255:19,22,	<b>movement</b>	107:17	188:24
23 256:8	53:22	164:18	197:19
261:4	104:11	178:2,16,	204:11
<b>month's</b>	155:10	18 180:12	223:12
43:17 44:6	<b>movements</b>	188:14	225:18
103:3	11:8	235:25	232:16
<b>monthly</b>	109:25	236:20	233:1
66:23 67:9	<b>moving</b> 94:2	237:3,8,20	238:25
94:20	<b>MSS</b> 34:23	263:25	<b>necessarily</b>
96:19	35:1	267:15	35:25
255:11	<b>multilingual</b>	<b>narrow</b> 33:6	182:1
<b>monthly-type</b>	17:11	<b>narrowed</b>	185:19
72:11	<b>multiple</b>	38:12	241:8
<b>months</b> 43:14	151:18	<b>National</b>	<b>needed</b> 36:9
60:18 64:9	<b>murdered</b>	275:22	148:1
71:1	34:15	<b>nationality</b>	150:13
206:18	146:11,23,	188:3	178:18
275:4	25	<b>nationals</b>	257:10,12
<b>morning</b> 7:1	<b>mutual</b> 11:7	33:14	263:9
8:3		86:7,10,22	<b>needing</b> 62:2
<b>motion</b> 77:5,	<b>N</b>	180:18	<b>nefarious</b>
22 279:19		246:22	136:12
<b>motivation</b>	<b>N-E-W-S-E-U-M</b>	<b>nationwide-</b>	<b>negotiate</b>
141:8	231:20	<b>organized</b>	257:4,16
<b>motives</b>	<b>named</b> 115:9	245:10	<b>negotiating</b>
205:8	138:6	<b>natural</b>	36:6 38:3
<b>MOU</b> 98:5,9	236:17	141:7	<b>negotiation</b>
<b>mouthpiece</b>	265:13,24	<b>nature</b> 11:14	47:1
251:18,19	<b>names</b> 24:1,6	19:11	275:11
<b>move</b> 87:8	25:9 50:6	49:24 66:4	<b>nerves</b> 287:3
268:8	69:3 70:3	76:1 89:19	<b>nervous</b>
281:6,12	91:20	140:6	139:20,22
<b>moved</b> 55:22	92:18	162:12	<b>Netherland's</b>
206:25	95:24	176:8	201:18,19
	106:4,5,7	187:13	



## EASTERN PROFIT CORPORATION LIMITED vs STRATEGIC VISION US, LLC

J. Michael Waller on 02/08/2019

Index: network..objectionable

<b>network</b>	<b>non-</b>	162:10	
17:16	<b>prioritized</b>	163:12	<b>O</b>
73:18	235:25	166:24	
240:11,25	<b>non-profit</b>	<b>NSA</b> 196:15	<b>oath</b> 74:12
241:1,5,17	9:12 31:19	275:22	<b>object</b> 19:18
242:2,12,	155:16		51:3 70:10
14 243:14		<b>number</b> 46:10	<b>objected</b>
252:8	<b>normal</b> 50:2	48:24 49:7	36:13
279:7,15	101:21	53:4,5	43:16
	<b>North</b> 241:11	56:16	94:14
<b>networking</b>	262:23	84:14	
17:5		96:18,19	<b>objecting</b>
251:24,25	<b>Northeast</b>	131:25	94:19
	9:2	181:4	<b>objection</b>
<b>networks</b>	<b>Notary</b> 7:23	184:8,10	20:19,23
17:7 25:5	<b>note</b>	257:19	21:1 29:8
223:22	189:16,20,	267:13	32:20 34:4
240:5	25 190:11	271:5	38:7 56:11
241:2,7		283:10	75:17
246:22	<b>noted</b> 133:16	284:12	76:10
278:19,25	<b>notes</b> 22:15,	<b>numbered</b>	77:4,15
<b>Newark</b> 212:1	18,21	178:3	78:22
<b>news</b> 70:11	23:13,14,	236:9	79:25
105:1	16,17	237:2	81:14 84:6
158:14	33:3,8		90:2,20
242:8	154:12	<b>numbering</b>	95:13
249:1	190:2,8,20	17:24	96:10
<b>Newseum</b>	191:3	<b>numbers</b>	132:13
231:19	199:24	187:5,6	137:15
<b>non-chinese</b>	<b>notice</b> 44:7	219:13	150:23
267:15	45:7 289:8	237:20	164:10
		244:19,23	187:18
<b>non-corrupted</b>	<b>notified</b>	269:25	193:5,14
165:23	65:11		196:5
166:1,14	<b>notorious</b>	<b>nuts-and-bolts</b>	197:9
<b>non-</b>	101:15	17:14	281:24
<b>investigatory</b>	<b>November</b>		<b>objectionable</b>
32:6	21:14		154:8

## EASTERN PROFIT CORPORATION LIMITED vs STRATEGIC VISION US, LLC

J. Michael Waller on 02/08/2019

Index: objects..opposition

<b>objects</b>	244:2	<b>online</b>	58:8	<b>opportunity</b>
265:21,22	<b>offer</b> 35:3	240:11	44:20	
<b>obligation</b>	207:20	241:3,17	223:9	
261:1,2	283:2	248:18,20	281:2	
<b>observed</b>	284:4	249:6,20,	<b>opposed</b> 68:9	
145:7	<b>offered</b> 30:4	25 250:3	110:3,14	
<b>obsessing</b>	94:25	<b>Open</b> 262:9	163:25	
253:2	102:10	<b>opened</b> 173:3	200:21	
	104:8	<b>operate</b>	246:19	
<b>obtain</b>	123:9	45:10	251:20	
213:24	207:4	91:19	258:22	
<b>obtained</b>	252:5	234:16	<b>opposing</b>	
196:9	<b>offering</b>	<b>operation</b>	11:8	
<b>occasion</b>	63:24	60:21	<b>opposition</b>	
17:20 49:4	261:10	248:5	9:20 11:18	
175:2	<b>offhand</b> 38:1	273:9	14:10,12,	
<b>occasions</b>	<b>office</b> 16:2,	<b>Operations</b>	18,19	
159:19	4 114:11,	11:19	16:9,24	
174:13	15 180:10	77:10	28:20 30:6	
268:5	<b>officers</b>	<b>operators</b>	52:9	
<b>occur</b> 91:5	196:9	256:20	109:9,14,	
125:12	256:14	<b>opinion</b>	19 110:2,	
131:15	<b>official</b>	254:3	9,11,16,	
146:17	53:18	<b>opinions</b>	17,21	
198:14	131:25	254:11,12	111:12,16	
<b>occurred</b>	180:25	<b>opponent</b>	115:24	
24:10	<b>officially</b>	252:1	137:2	
63:13	181:23	<b>opponents</b>	141:24	
201:11	<b>officials</b>	242:8	155:9	
<b>occurring</b>	25:6 132:3	249:3,4	156:1	
142:11	<b>old-fashioned</b>	254:11	227:12	
<b>Oceanic</b> 10:6	15:1	<b>opportunities</b>	229:15	
41:19	<b>ongoing</b>	71:4	240:23	
<b>offensive</b>	264:19		244:17	
243:24			245:14,15	
			254:20,22,	
			25	

## EASTERN PROFIT CORPORATION LIMITED vs STRATEGIC VISION US, LLC

J. Michael Waller on 02/08/2019

Index: oppressed..part

<b>oppressed</b>	<b>orient</b>	<b>owes</b> 45:5, 6	37:20
245:24	192:13	<b>owns</b> 83:6	<b>paradox</b>
<b>oral</b> 40:2	<b>original</b>		269:7
200:21	19:22	<b>P</b>	<b>paragraph</b>
<b>orally</b> 78:13	28:16		55:11
184:18	85:17	<b>p.m.</b> 157:6	97:10
<b>order</b> 36:3	<b>originated</b>	<b>pages</b> 219:16	284:1, 11,
76:15	268:3	<b>paid</b> 37:17	14 285:3
79:19	<b>OSINT</b> 262:10	38:24	287:12, 13,
94:24	<b>other's</b> 54:2	39:2, 13	18
159:2	<b>out-of-pocket</b>	40:6 43:16	<b>paralegal</b>
<b>ordered</b>	223:24	54:5 93:23	83:2, 3
266:23	<b>out-of-wedlock</b>	99:13	<b>parallel</b>
<b>orders</b> 75:10	268:8	100:20	95:2
<b>Ordinarily</b>	<b>outfit</b> 116:4	103:18, 19,	<b>parameters</b>
23:17	<b>outlined</b>	21 161:16,	92:17
<b>ordinary</b>	49:1	17 186:17,	175:25
223:19	<b>outrageous</b>	19 219:22	<b>pardon</b> 39:13
<b>organization</b>	241:24	222:19, 21	114:18
32:2	<b>outset</b> 28:3	225:4, 12	128:14
<b>organizational</b>	<b>outsourced</b>	249:15, 17	132:19
246:5	84:10	250:20	135:11
<b>organize</b>	<b>over-funded</b>	256:23	174:23
155:24	251:15	257:1	177:8
<b>organized</b>	<b>overhead</b>	259:24	218:3
156:19	39:8	<b>paper</b> 37:20	264:4
221:16	<b>overlap</b> 18:2	61:23 68:9	<b>parents</b>
245:1	<b>overlooking</b>	87:24	130:18
<b>organizer</b>	31:25	88:2, 3, 8,	148:12
53:23	<b>oversimplified</b>	15 101:11,	<b>part</b> 24:8
<b>organizing</b>	142:2	12 150:8	34:11 42:6
156:11	<b>owe</b> 40:24	169:5, 6, 8,	46:5, 6, 8
240:21		11 224:25	55:6 58:2,
		229:3	3 75:5, 12,
		234:11	13, 19
		<b>paperwork</b>	

## EASTERN PROFIT CORPORATION LIMITED vs STRATEGIC VISION US, LLC

J. Michael Waller on 02/08/2019

Index: partial..payment

76:2,4	69:23	268:7	<b>patience</b>
77:4 82:9,	231:23		289:21
10 84:18	283:7	<b>party's</b>	
86:8,15		239:10,18	<b>pay</b> 36:16
87:4 90:7	<b>participated</b>	<b>pass</b> 68:5	37:6,18
94:10	266:20		42:22
110:18	<b>parties</b>	<b>pass-through</b>	43:17 45:6
115:25	29:13	41:12 68:6	91:6,10
117:10	90:24 98:6	<b>passed</b> 56:5	92:4 93:6,
123:11	204:20	68:20,23	8 98:16
125:18,19	224:13	83:5	99:8
150:21	<b>partner</b> 83:5	<b>passport</b>	101:17
156:24,25		179:15	103:3
162:15,17,	<b>Partners</b>	180:10	104:8
20 174:22	10:7 41:20	187:5	118:8
207:9	<b>partnership</b>		121:18
222:4	131:25	<b>passports</b>	123:13
228:14,15	<b>parts</b> 155:25	69:13,15	196:8
231:13	220:17	179:20	219:21
236:7	262:15	180:8	220:1,2
238:17		188:25	224:3,22,
242:11	<b>party</b> 24:19,	<b>password</b>	23 225:2,9
246:17	23 25:6,9,	214:6,8,	249:9
250:17	12 86:12	10,14,19	250:17
253:16	90:1 110:4		279:24
254:16	130:18	<b>passwords</b>	285:8
257:20	131:5	213:22,25	
260:20	132:7	214:3,4	<b>paying</b> 207:2
261:23,24	137:3	288:5	220:17
264:18	139:15	<b>past</b> 19:5	224:12,16,
265:2	140:15,18	30:16	25 261:3
276:21	141:3	51:11 55:3	<b>payment</b>
284:22	145:25	106:18	36:16,19,
285:23	148:11	107:4,6	20 37:5
	189:5	112:25	40:9 41:21
<b>partial</b>	239:12,13,	146:24	42:20
97:16	15,17	<b>path</b> 73:5	43:6,9
<b>participate</b>	253:4,6,8	214:18	45:2
			99:12,13

## EASTERN PROFIT CORPORATION LIMITED vs STRATEGIC VISION US, LLC

J. Michael Waller on 02/08/2019

Index: payments..person

159:18,22	17,18,22	22 246:3	<b>performing</b>
160:6	83:8 84:16	249:11	13:6
220:14	85:21 86:3	250:5,9	<b>period</b> 37:6,
288:25	91:18 96:4	251:12,17	19 64:11
<b>payments</b>	104:24	252:21	89:12
36:23,25	106:16,23	254:8,9	127:12
37:22	107:2	257:10,12,	<b>periodically</b>
40:10,17	110:11	18,19	150:18
42:1,4,13,	112:11	258:25	<b>peripheral</b>
25 98:17	122:20	263:18	281:7
100:18,23	125:4	264:11	<b>permanent</b>
159:2	130:19	267:15	246:9
222:25	131:4	269:15	<b>perplexed</b>
<b>pays</b> 45:5,8	138:18,21	274:4	280:15,17
93:11	141:9	<b>People's</b>	<b>person</b> 21:22
<b>peer</b> 170:6	144:10,21	25:3 253:6	50:2 69:7
<b>peers</b> 188:19	146:5	285:20	70:16
<b>pending</b>	156:12	<b>per-report</b>	71:15,16
132:23	174:11	95:12	80:21
<b>Penn</b> 203:1	178:20,22,	96:23	81:10
211:11	25 181:15	<b>percent</b>	82:21 83:4
212:2	182:6,7,24	184:1	102:23
<b>people</b> 15:19	183:6	<b>perception</b>	104:23
23:20	184:4,19,	104:25	119:19
25:24	21 185:18,	<b>perfectly</b>	129:25
48:24	20 210:25	273:19,20	130:1,20
49:10	213:23	<b>perform</b> 15:8	133:7
50:10,11	222:8	29:18	141:10
53:25	223:21	52:16	145:2,4
55:23	224:3,4,	252:9	147:21
69:5,6	16,19	<b>performed</b>	148:8
70:5	236:10	13:17,23	160:17
71:15,23	237:15,25	14:3,9	162:22
73:6,18,23	240:1	16:10	179:4
76:12,16,	241:25	52:11	181:5
	242:19		182:3
	243:6,14		
	245:8,21,		

## EASTERN PROFIT CORPORATION LIMITED vs STRATEGIC VISION US, LLC

J. Michael Waller on 02/08/2019

Index: person's..point

183:24	<b>persuade</b>	<b>picked</b> 65:16	<b>plaintiff</b>
184:8,10	148:5	<b>picture</b>	7:15 8:4
185:22,23	<b>pertaining</b>	71:22	53:13
192:1	151:9	72:13	<b>plan</b> 21:12
194:12	180:25	235:10,18	34:8,9,10
236:9			39:11
242:20,21	<b>Ph.d.</b> 9:9	<b>pictured</b>	159:13
282:2	<b>phase</b> 274:16	244:12	210:24
<b>person's</b>	<b>Phi</b> 9:6	<b>piece</b> 69:16	228:17
184:9	<b>philanthropic</b>	<b>pieces</b> 36:3,	233:23
<b>persona</b> 69:8	248:4	10	252:20
178:20	<b>phone</b> 80:23	<b>Pierre</b>	<b>planes</b>
<b>personal</b>	129:25	201:13,15,	213:14
17:7 34:14	130:1,3,6	23	<b>planned</b>
84:13	153:19	<b>pillars</b>	195:16
145:23	282:5	239:21	<b>playbook</b>
167:18	<b>phonetic</b>	<b>pin</b> 64:3	227:25
219:13	120:17	154:19	228:5
<b>personality</b>	<b>photocopied</b>	<b>pirates</b>	<b>playing</b>
61:9	190:13	271:7,8	136:19
<b>personally</b>	<b>physical</b>	<b>placate</b>	<b>pleased</b>
15:4,5	78:7 89:19	206:14	86:12
28:5 38:20	114:15	209:18,19	<b>plenty</b>
55:5 62:12	154:14	<b>place</b> 9:2	281:12
89:4	<b>physically</b>	36:4,10	<b>plugged</b>
106:12	47:16	55:23	202:24
146:4	58:7,8,10	56:15	<b>plural</b> 53:14
187:12	68:1	136:18	<b>pocket</b>
202:22	190:25	156:5	241:24
249:21,22	194:2,3	188:3	<b>point</b> 36:6
250:2	196:14	192:18	58:23
<b>persons</b>	219:15	245:2	71:18 72:4
218:17	<b>pick</b> 58:11	<b>places</b> 99:4	91:16
<b>perspective</b>	68:1	262:25	92:15
214:12			

## EASTERN PROFIT CORPORATION LIMITED vs STRATEGIC VISION US, LLC

J. Michael Waller on 02/08/2019

Index: points..presence

127:18	53:18	232:25	152:16
134:3,8	104:12	<b>Pour</b> 251:12	<b>predating</b>
140:8	206:3	<b>pouring</b>	148:19
143:9,23	237:25	251:11	<b>predict</b>
149:22	239:25	<b>power</b> 24:24	91:17
178:3,5	240:5,16,	275:19	<b>preexisting</b>
187:20,21	20 241:2	<b>Powerpoint</b>	210:17
188:2	244:16	233:21	<b>preliminary</b>
202:18	248:4	<b>PR</b> 244:8	59:13
251:8	<b>politics</b>	<b>practical</b>	60:7,8
273:23	9:16 73:18	275:13	61:15,19
282:3	<b>population</b>	<b>practicality</b>	62:7,16,21
<b>points</b> 134:7	246:8	88:10	63:1
178:6	<b>port</b> 58:7	275:18	65:23,25
<b>poisoned</b>	61:21	<b>practice</b>	66:5,8
146:22	<b>portion</b>	66:16	68:12
<b>police</b>	100:19	81:25	149:16
130:19	255:13	151:21,22	192:15
132:1	<b>poses</b> 124:7	249:7	272:21
145:25	<b>positive</b>	<b>practices</b>	<b>premature</b>
156:13	242:17	82:5 136:7	144:24
188:23	243:18	277:20,21	<b>prematurely</b>
239:17,23	<b>possibly</b>	<b>pre-contract</b>	97:14
<b>policy</b> 9:13	96:3	162:11	144:9,15,
14:11,20	178:8,9	<b>precautions</b>	21
31:19	<b>Post-it</b>	287:14,25	<b>prepared</b>
51:13	189:16,19,	288:3,4	227:4
115:20	25 190:11	<b>precise</b>	<b>preparing</b>
116:2	<b>post-putin</b>	220:22	44:21
124:16	253:2	<b>precisely</b>	<b>prerogative</b>
243:10	<b>posture</b> 77:5	61:8	132:9
249:4	261:19,22	122:10	<b>presence</b>
<b>political</b>	<b>potential</b>	147:25	159:23
14:10,15,	119:21		230:25
20 17:6			
51:13			



## EASTERN PROFIT CORPORATION LIMITED vs STRATEGIC VISION US, LLC

J. Michael Waller on 02/08/2019

Index: present..prisoner

232:10	<b>presenting</b>	92:2,10	134:3
<b>present</b>	203:5	<b>previous</b>	250:5
29:14	<b>President</b>	13:3 107:8	283:12
32:24	24:24	158:24	<b>principally</b>
47:16,20,	115:19	230:7	9:13 10:4
22 54:21	243:11	234:1	<b>principals</b>
63:16	<b>President's</b>	243:1	283:11
82:20	243:9,17	<b>previously</b>	<b>print</b> 164:1
106:18	<b>presidential</b>	115:22	<b>printed</b>
107:4,6	112:15	<b>price</b> 35:12	61:22
152:19,24	<b>pressure</b>	91:11,12	177:15
155:20	240:18,21	96:16	190:18,24
156:5	<b>prestige</b>	97:11	234:10
167:13,14,	31:23	121:4	<b>printouts</b>
15 169:1	<b>presume</b>	123:4,7,8,	88:6 150:8
197:11	100:17	12,13	<b>prior</b> 20:5
198:5,6	119:6	247:13	31:2,14
202:14	150:24	251:8	38:11
218:18	258:6	<b>prices</b>	51:20 57:4
228:6	<b>presumed</b>	121:17	58:23
234:6	132:6	122:5,6	59:17
267:18	161:18	123:9	62:19
285:12	<b>presentation</b>	<b>pricing</b>	64:14
173:12,13	<b>pretend</b>	152:18,19	88:23
231:5	78:25	<b>Primarily</b>	112:3
232:13	<b>pretty</b>	241:12	115:16
233:21	105:25	<b>primary</b>	129:20
235:18	<b>prevent</b>	134:8	142:16
<b>presentations</b>	91:15	143:9	271:21,23
234:9	93:4,21	<b>Prince</b>	273:12
<b>presented</b>	145:6	115:9,13	<b>prioritize</b>
27:21	183:2	<b>princess</b>	235:22
167:5	238:11	110:25	<b>prioritized</b>
219:18	243:20	<b>principal</b>	237:11,14
268:16	<b>prevented</b>		<b>prisoner</b>

## EASTERN PROFIT CORPORATION LIMITED vs STRATEGIC VISION US, LLC

J. Michael Waller on 02/08/2019

Index: private..project

53:19	22:11	<b>professionalis</b>	39:4, 5
<b>private</b>	86:25	<b>m</b> 123:1	40:1 42:5,
9:17, 18	186:1	<b>Professor</b>	20, 23
128:5	<b>produce</b>	9:14	43:3, 10,
185:7, 11	55:12	<b>professors</b>	13, 22
<b>privy</b> 153:22	84:17	278:10	44:3, 4, 9
<b>pro-guo</b>	205:13	<b>profile</b>	45:17
246:16, 25	275:14, 21	27:25	<b>program</b>
<b>problem</b> 33:3	<b>produced</b>	<b>profit</b> 7:4,	256:9
90:22	20:3 71:1	16 8:5	<b>progress</b>
91:21 97:2	127:8	13:13	55:12, 15,
124:16	154:21	28:19	17, 19, 20,
152:6	169:18	44:12, 14,	21, 25
170:19	282:11	17, 19, 25	56:10, 13
180:5	<b>producing</b>	45:3, 9, 13,	57:4, 6, 17,
192:24	66:23	16 75:8	25 58:18
195:7	94:19	99:21, 25	59:1, 16, 24
207:12, 15	273:14	100:1, 2, 6,	60:3 61:17
<b>problematic</b>	275:18	10, 14, 20	65:22
170:21	<b>product</b> 52:3	101:3	66:5, 7
<b>problems</b>	56:7	104:4	127:14
71:3 90:18	61:22, 23	118:4, 9	193:3
180:6	67:19	124:14	196:1
195:9, 19,	93:12	136:24	197:18
21	176:10	159:15	198:3
<b>procedural</b>	264:16, 17	160:25	200:18
77:5	267:11	161:11, 12,	272:22
<b>procedures</b>	276:21	16, 20	276:20, 22
195:12	<b>production</b>	188:13	<b>project</b>
<b>proceed</b> 94:5	20:2 22:21	248:1	11:24
173:14	40:16	286:1, 9	12:2, 4
<b>proceedings</b>	169:17	287:6	13:12 16:5
290:6	<b>profession</b>	<b>profit-making</b>	17:2 19:11
<b>process</b>	84:12	247:22	42:3, 10
		<b>profits</b>	49:19
		38:19, 21	55:19 57:7
			59:19

## EASTERN PROFIT CORPORATION LIMITED vs STRATEGIC VISION US, LLC

J. Michael Waller on 02/08/2019

Index: Projected..provided

89:10	251:8	<b>propose</b>	<b>protection</b>
116:20,22	<b>promoting</b>	122:9	183:2,17,
117:3	104:11	<b>proposed</b>	23
131:16		129:12	<b>protest</b>
132:12,14	<b>promotional</b>	130:14	53:23
134:12	261:24	152:25	156:11
144:10	<b>prompt</b>	244:9	245:11
145:9	172:11	253:16	
147:22		255:11	<b>protesters</b>
150:13	<b>promptly</b>		156:18
163:19,20,	205:23	<b>proposition</b>	
21 164:17	206:1	137:11	<b>protests</b>
166:20,23	<b>pronunciation</b>		155:24
186:14	155:6	<b>prorated</b>	245:1,10
205:8	<b>proof</b> 59:3	94:15	<b>prove</b> 137:20
234:21		<b>prosecuted</b>	
<b>Projected</b>	<b>propaganda</b>	239:7	<b>provide</b>
255:19	246:5	<b>prosecution</b>	26:24
	<b>propagandists</b>	238:1,14,	28:20
<b>projects</b>	254:10	24 239:1	29:10,21
11:4			30:10
12:11,19	<b>properly</b>	<b>prospective</b>	39:23
13:1,14,23	12:17	11:10	40:13
14:9 16:9	<b>properties</b>	106:19	68:13,18
29:3 52:7	31:21	107:5	76:16,24
84:22	32:10	<b>protect</b>	80:4 82:4
111:19,20	121:5	23:19,20	85:2 107:9
114:25	231:21,24	101:14,25	111:15
		139:24	118:19
<b>promise</b>	<b>property</b>	144:7	119:22
78:9,12	31:23	237:25	126:10
206:13	34:16		141:10
208:17,21	231:14,15,	<b>protected</b>	218:4,15
	17 232:8	180:14,20	219:10,16
<b>promised</b>		181:1,8,22	220:6
95:9	<b>proposal</b>	182:25	229:6
	230:23	185:24	
<b>promote</b>	232:14		<b>provided</b>
250:1,10	260:16	<b>protecting</b>	9:23 28:19
<b>promoted</b>		84:19	30:11 55:3

## EASTERN PROFIT CORPORATION LIMITED vs STRATEGIC VISION US, LLC

J. Michael Waller on 02/08/2019

Index: providing..question

66:3 74:20	<b>public</b> 7:23	<b>pushing</b>	162:14
79:14	31:19	278:15	163:24
81:25	104:23		240:18
106:10	164:3	<b>put</b> 27:19	
107:14	181:16	48:7 50:4	<b>Pyratz</b>
108:10	222:1	67:16	271:4,6,9,
110:13	239:20	68:25 79:1	10
140:20		126:25	
142:21	<b>publicize</b>	137:9	<b>Q</b>
164:17	189:8	144:9	
165:4	<b>pull</b> 266:25	145:5	<b>Qatar</b> 111:8
178:12	276:15	147:21	<b>Qing</b> 212:18
214:17	<b>purchasing</b>	151:2	<b>quality</b>
218:6,7,8	30:13	154:19	80:17
221:24	232:8	156:2	83:20
235:17		171:1	112:7
274:9	<b>purpose</b>	190:19	122:23
276:8	23:13	197:10	141:15
	37:23	203:14	144:6
<b>providing</b>	39:14	205:5	209:24
11:21 29:6	101:14	221:25	277:15
35:3,11	137:13	223:6	
51:8,19	173:22	279:4	<b>quantify</b>
66:16 92:2	196:1	288:17	16:18 50:3
141:11	272:2	<b>Putin</b> 110:9,	<b>quantities</b>
162:24,25	<b>purposes</b>	11 146:10	276:15
<b>provision</b>	14:20 25:4	147:1	<b>quantity</b>
74:25	101:13	245:10	204:13
<b>provisional</b>	179:1	252:14,19,	273:8
156:19	239:25	21,22	
	240:6	253:2	<b>quarter</b>
<b>provisions</b>	246:5		186:17
22:16		<b>Putin's</b>	
<b>provocateur</b>	<b>pushback</b>	252:24	<b>question</b>
137:20	87:21		8:11,12
	<b>pushed</b>	<b>putting</b> 58:4	21:4,8
<b>Psycho-</b>	146:5,14,	59:5 76:4	28:16
<b>political</b>	16	89:20	33:1,4
233:10		139:21	44:16,25
		147:17	

## EASTERN PROFIT CORPORATION LIMITED vs STRATEGIC VISION US, LLC

J. Michael Waller on 02/08/2019

Index: questioning..recall

48:9 57:13	72:11	<b>rate</b> 95:14	16 31:13
61:12	97:13	96:18	69:4 96:4
63:23 92:8	176:3	<b>rats</b> 271:9	119:15
98:2	192:12		141:22
106:21	202:8	<b>raw</b> 56:4	155:21
118:7	247:19	57:11	178:22,25
126:8,18		61:20 62:2	231:12
128:24,25	<b>quote-unquote</b>	64:18 66:9	
130:16	45:3	67:12,18	<b>realized</b>
132:23	184:20	69:18	86:19
147:13,14	<b>quoted</b>	71:7,9	158:9
177:10	247:14	72:19 80:7	<b>reason</b> 90:6
183:5	<b>quotes</b> 70:15	85:22 88:9	133:13
208:12,16,	103:2	<b>re-liking</b>	136:8
17 214:15		250:7	141:17
243:15	<b>quoting</b>		142:24
252:23	274:10	<b>re-met</b> 117:9	149:1,6
261:15		<b>re-tweeting</b>	177:22
272:1	<hr/> R <hr/>	250:7	184:23
<b>questioning</b>	<b>rail</b> 212:1	<b>reaction</b>	207:16
205:8	<b>raise</b> 105:3	158:13	263:2
		173:11	265:20
<b>questions</b>	<b>raised</b> 30:20		<b>reasonable</b>
8:13	85:21	<b>read</b> 18:14	199:4
134:14	136:13	21:6,9	
158:18	174:14	47:12	<b>reasons</b>
282:16		54:10	76:25
289:23	<b>rallying</b>	85:11 87:3	100:18
	240:22	126:7	129:5
<b>quickest</b>		147:11	176:6
276:6	<b>ramp</b> 276:3	264:4,5	239:6
<b>quiet</b> 205:3	<b>ran</b> 179:21	284:9	242:23
	<b>range</b> 25:10		275:15
<b>quit</b>		<b>reading</b>	
220:20,21,	<b>rapid</b> 177:2	132:19	<b>recall</b> 10:21
23,24,25	275:14	151:25	22:19
221:2,4,12	<b>rapidly</b>	<b>ready</b> 166:19	23:11 24:8
<b>quote</b> 55:25	94:12	<b>real</b> 30:13,	27:19
61:21			29:24,25

## EASTERN PROFIT CORPORATION LIMITED vs STRATEGIC VISION US, LLC

J. Michael Waller on 02/08/2019

Index: receipt..recruited

30:1 32:17	285:11	<b>recognize</b>	181:8
33:9 34:12		18:17,19	183:17
35:24 37:9	<b>receipt</b>	46:14	196:20,24
41:20 43:8	226:22	105:16,21	270:13,14,
57:2,15	<b>receive</b> 45:9	106:4	17 281:4
62:6 63:12	75:8 118:3	113:7	289:24
64:16 70:3	165:3	116:10	290:3
74:25	194:24	164:13	
94:15	237:7	212:20	<b>records</b>
107:19	<b>received</b>	213:5	40:16 41:2
108:21	42:19 43:2	215:3	43:7
109:7	99:17	226:5	180:13,15,
122:1,10	100:21,24	229:25	20,24,25
123:12	160:25	233:17	182:25
128:14	165:6	259:6	183:2,23
131:7	166:7	264:2	185:24
143:10	193:17,19	267:7	199:9,13,
153:4,25	194:5	270:25	15 289:15
162:7	237:6,9	271:2,3	<b>records-</b>
164:23		282:25	<b>protected</b>
165:22,25	<b>receiving</b>	284:2	181:17
169:13	43:8		182:4,10
173:19	176:23	<b>recollection</b>	184:2,5,
174:9	177:13	123:3	10,15,20
186:10	<b>recent</b> 110:8	150:9	218:17
192:18	<b>recently</b>	<b>recommending</b>	260:8
197:25	169:19	233:23	<b>recover</b>
198:2,8,		<b>reconcile</b>	238:10
10,16	<b>reception</b>	206:5	<b>recovering</b>
199:11	10:22		248:7
201:2,7,25	<b>recess</b> 74:8	<b>record</b> 7:2	
203:1,7	105:9	43:21	<b>recovery</b>
204:1,18	157:5	74:6,9	238:2,14,
225:14	196:22	77:21	17,19
232:20,23	270:16	104:23	248:1
235:21,23		105:6,7,10	
245:12	<b>recitation</b>	130:11	<b>recruited</b>
258:3	248:23	132:21	55:22
		157:3,7	56:14

## EASTERN PROFIT CORPORATION LIMITED vs STRATEGIC VISION US, LLC

J. Michael Waller on 02/08/2019

Index: red..remember

<b>red</b> 174:14	140:16	<b>related</b>	<b>released</b>
183:11	158:25	25:11 42:2	145:12
<b>Redemption</b>	<b>refers</b> 48:18	45:25	238:8
179:4	144:12	124:15	<b>releases</b>
<b>redirect</b>	252:19	139:19	145:1
289:22	<b>refocusing</b>	172:15,16	<b>releasing</b>
<b>reduce</b>	69:24	181:11	144:15
240:20	<b>refreshes</b>	268:10	<b>relevant</b>
<b>redundant</b>	129:16	<b>relating</b>	115:10
118:2	<b>refuse</b>	11:7 31:19	<b>remain</b> 144:6
<b>refer</b> 70:15	77:12,25	<b>relation</b>	243:24
97:10,11	<b>refusing</b>	147:23	<b>remainder</b>
150:17	225:2	<b>relations</b>	51:17
152:2	<b>regained</b>	177:18	<b>remained</b>
170:5	133:18	<b>relationship</b>	159:12
<b>reference</b>	<b>regard</b>	34:18	<b>remember</b>
255:14	246:15	72:20	23:21
277:3,11	<b>regime</b> 25:1	117:14,16,	30:20
<b>referenced</b>	110:9	18 134:10	32:19 43:7
55:9	137:6,14	148:7	92:18
236:14	156:5,10	185:8	105:4
<b>referral</b>	228:1	191:19	113:18
117:21	242:23	220:8,10	115:18
<b>referred</b>	252:24	<b>relationships</b>	122:5
21:8 48:1,	254:9,11,	268:6	123:6
10 49:13	12	269:22	131:9
50:17	<b>region</b>	<b>relatives</b>	137:23
248:21	245:4,19	25:9	146:24
284:13	<b>regular</b>	<b>relay</b> 217:19	150:10
<b>referring</b>	127:8	<b>relayed</b>	152:16
41:10	181:19	219:11	153:21,23
46:19 53:3	247:9	<b>release</b>	154:3,5,22
65:20	<b>reintroduced</b>	144:8,18,	166:12
119:12,13	116:24	20,24	167:14
			172:6,7



## EASTERN PROFIT CORPORATION LIMITED vs STRATEGIC VISION US, LLC

J. Michael Waller on 02/08/2019

Index: remind..rerouting

179:3,17	66:1,5,6,	20,25	<b>representative</b>
186:6	11,13	56:8,20	38:11
194:2	67:6,14,16	60:4 66:2,	<b>representing</b>
198:15	68:4 70:22	3,7,8,11,	183:9
199:20	71:7,17	24 67:2,5,	216:6
203:4,17	72:22	9,11,21	281:18
232:19,22	96:9,17,20	68:12,15	
258:4,7	97:1,8,13,	69:24	<b>Republic</b>
266:4	16 101:24	70:15,18,	25:3 253:7
	141:14	23 72:16	285:21
<b>remind</b> 74:11	180:4	92:3 93:5,	<b>request</b>
<b>Repeat</b> 21:4	197:7,12,	22 94:20	25:16 77:6
65:5	16,22	95:19	167:16
106:21	198:3,12,	96:8,14,22	168:1
<b>rephrase</b>	13 200:3,	97:12	251:10
90:13	10,14,19	105:1	252:10
	201:4	127:7,13,	289:13
<b>replace</b>	212:17,25	14,15	
97:15	213:1	176:3	<b>requested</b>
237:17	263:24	196:1	35:7,8
252:25	265:14	197:1,14,	36:12
	266:11,20,	18 200:25	167:10,12
<b>reply</b> 184:8	22 272:23	216:10	236:21
<b>report</b>	276:20,22	217:24	289:10
55:13,16		218:3,4,9	<b>requesting</b>
56:2,10,13	<b>reported</b>	236:21,22	195:24
57:4,6,10,	174:10	266:14	
17,25	212:14	272:12,19,	<b>requests</b>
58:18		22	35:18
59:2,13,	<b>reporter</b> 7:8		
16,24	8:12,15		<b>required</b>
60:3,7,8,	21:9 98:18	<b>represent</b>	207:13
20 61:15,	107:23	8:4 244:23	
17,19,22	117:6	262:6	<b>requirements</b>
62:7,16,21	146:19		58:6
63:2 64:5,	<b>reporting</b>	24:3 63:12	<b>requiring</b>
9,14 65:8,	72:11,12	285:12	85:1
18,20,22,			
23,24	<b>reports</b>	<b>representation</b>	<b>rerouting</b>
	55:8,17,	s 284:19	39:14

## EASTERN PROFIT CORPORATION LIMITED vs STRATEGIC VISION US, LLC

J. Michael Waller on 02/08/2019

Index: research..respect

<b>research</b>	61:20	164:17	202:10
9:13,21	64:9,14	170:22	256:20
14:10,12,	65:24	171:11	268:10
17,25	66:6,11,	180:22	269:22
15:1,9,17,	13,17,22	184:7	
22 16:9,24	67:8 70:4,	186:1	<b>researching</b>
17:17 18:6	22 71:7,	188:17	50:10
19:1,23	19,22	189:1,7	89:25
22:24	72:15	192:13,21,	145:2
25:16	73:3,17	25 195:8	182:8
27:24	75:10	196:4	192:15
28:21	76:14,16,	202:25	288:10
29:7,11,	18,23	207:12	<b>reside</b> 81:20
15,16,17,	79:23	219:19,20,	<b>residence</b>
18,22	82:10,15,	22 222:3	21:23 22:7
30:5,6,9	24 83:17	223:22	63:15
32:15	85:17 87:4	229:15	168:25
33:16,18,	89:10	234:23,24	169:9
20,22 34:7	90:24 91:7	237:19	188:3
35:12	92:3 94:11	252:8,9	203:9
37:14	99:1 100:7	253:14,23	204:22
38:17	108:15	254:16	230:18
39:2,19,21	111:19	260:16,17	285:18
40:7,12	114:1,6,21	261:4	
41:8,13,22	121:9	264:17,19,	<b>residing</b>
43:3,22	122:23	20,24	167:22
45:23	124:10	265:2,9	<b>residual</b>
46:11,18	131:2	273:6	44:2
48:1,10	136:10	287:14,25	<b>resolve</b>
49:4,5,19	141:25	288:11	272:25
50:16	142:1,18		273:16,24
51:8,19	144:17,19	<b>researched</b>	
52:9,11,	145:11	48:25	<b>resources</b>
13,14,19,	150:22	71:24	15:9 29:1
22 53:1,9	156:8,23	79:22	111:5
55:2,10	157:11,20	265:20,25	141:8
56:9 57:5	162:1	<b>researchers</b>	224:7
60:6,9	163:10,23	57:11 71:8	<b>respect</b>

## EASTERN PROFIT CORPORATION LIMITED vs STRATEGIC VISION US, LLC

J. Michael Waller on 02/08/2019

Index: respond..running

39:25	<b>retain</b>	177:21	204:23, 24
40:17	150:14	203:18	205:10
77:16	<b>retained</b>	212:25	<b>roots</b> 246:17
146:15	86:5, 14	215:14	<b>roughly</b>
235:16	191:7	<b>reviewing</b>	16:17 22:2
261:1, 7	260:13	18:13	36:15
<b>respond</b> 8:11	<b>retainer</b>	<b>revising</b>	55:18
<b>response</b>	136:8, 9	150:3	102:16
100:5	<b>retaining</b>	<b>rich</b> 163:19	110:7
103:4	42:15, 16	239:14, 15	143:13
119:2	<b>retrospect</b>	<b>right-hand</b>	177:2
121:22	196:7	53:5	198:1
126:16, 17,	<b>return</b>	189:14	200:10, 11
18, 19, 20	126:12	226:7	217:23
134:16	272:3	<b>rigorous</b>	218:10
141:13	<b>returned</b>	91:20	275:5
158:13	289:11	<b>riot</b> 156:13	277:1
167:25	<b>returning</b>	<b>ripped</b> 59:3,	<b>round</b> 72:8
217:16	58:11	4	<b>route</b> 37:23
251:10	<b>reveal</b>	<b>rips</b>	99:4, 14
272:8, 9	279:10, 11	104:15, 24	159:2, 5, 18
<b>restaurant</b>	<b>revenue</b> 39:5	<b>risk</b> 131:16	160:6
201:23	<b>revenues</b>	140:9	<b>RP</b> 185:24
203:2	45:18	<b>risks</b> 89:16	<b>RPS</b> 219:10
212:2, 10	<b>reversal</b>	<b>Roberta</b> 7:8	<b>rule</b> 253:6
<b>restricted</b>	289:12, 17	<b>Rockefeller</b>	<b>rules</b> 8:10
218:16	<b>reverse</b>	121:5	<b>run</b> 83:6, 19
<b>restrictions</b>	288:25	231:21	89:13
263:13	<b>review</b>	<b>rocks</b> 53:20	115:9
<b>results</b>	177:13	<b>role</b> 67:20	181:25
167:6	211:17	70:21	185:22
205:13, 16	213:10	<b>room</b> 23:2, 3	251:9
238:5	<b>reviewed</b>	63:18	<b>running</b>
275:14, 18,			46:1, 6, 8
22			

## EASTERN PROFIT CORPORATION LIMITED vs STRATEGIC VISION US, LLC

J. Michael Waller on 02/08/2019

Index: Russ..scrolled

223:20	<b>sake</b>	84:19	<b>Schmidt</b>	7:17	278:2
241:23	<b>salary</b>		10:2	17:23	281:4,24
<b>Russ</b> 7:20	148:21		19:17,20		282:14
<b>Russell</b>	149:4		20:4,19,23		286:19
182:20	<b>sanctuary</b>		21:2 29:8		287:2
<b>Russia</b>	137:1		31:8 32:20		289:23
110:23	<b>sat</b>	212:3	33:1,6		<b>school</b> 9:10,16
245:20,22	<b>Satellites</b>		34:4		
246:4,10,14,22,24	262:11		35:14,17		<b>scope</b> 15:7
251:23	<b>satisfaction</b>		38:7		23:9,10
252:13,20	273:22		40:18,23		38:12,13
253:3	<b>satisfactory</b>		52:5 56:11		90:25
<b>Russian</b>	98:19		61:3 75:17		121:4
108:6,8	<b>satisfied</b>		76:10		122:7
109:9,14,	167:6		77:15,20		123:14
18 110:2,	207:2		78:22		126:11
3,16,21	<b>satisfy</b>		79:5,25		127:19,23
111:12,16	79:20		81:14 84:6		136:5
115:23	94:24		90:2,13,20		176:7
242:4	102:12		94:22		257:7
244:16,25	<b>Saudi</b>	111:4,7	95:13		<b>scrapped</b>
245:14	<b>save</b>	23:13	96:10		229:17
246:11	149:22		106:12		<b>scratch</b> 29:2
251:25	261:11,14		110:5		<b>screen</b> 212:8
252:8,19	<b>saved</b>		114:20		<b>screenshot</b>
254:20,21	150:15,19		132:13		169:25
<b>Russians</b>	<b>SB</b>	119:2,5	137:15		172:1
146:25	<b>scale</b>	233:5	150:23		195:13
<b>S</b>	<b>scattered</b>		164:12		<b>screenshots</b>
<b>S-T-A-R-O-V-O-I-T-O-V-A</b>	262:5		175:8		168:13,17,
146:21	<b>schedule</b>		177:9		18 169:2,
<b>S-U-E-N</b> 70:9	127:8		187:18		24 172:2,
			189:13		14,21,25
			193:5,14		<b>scrolled</b>
			196:5		212:7
			197:9		
			200:20		
			206:21		

## EASTERN PROFIT CORPORATION LIMITED vs STRATEGIC VISION US, LLC

J. Michael Waller on 02/08/2019

Index: search..services

<b>search</b> 183:7	184:22	68:10	<b>serves</b>
<b>seat</b> 87:16	185:13	87:23	149:15
<b>secede</b> 110:1	221:23	92:23	194:1
<b>secondhand</b>	256:1	134:24	<b>service</b> 9:23
131:1	267:13	138:24	11:22 13:6
154:4	269:16,25	139:5	26:24
<b>secret</b> 132:1	275:22	142:3	28:18
145:25	<b>seeking</b>	186:17	29:11
183:10	196:16	288:16,17	35:4,9
188:23	<b>seldom</b>	<b>sensed</b>	55:3 81:1
234:16	275:13	134:17,22	99:6
239:17,23	<b>semipermanent</b>	<b>sensitive</b>	142:21
<b>section</b>	246:9	63:20	151:17
79:12	<b>semipublic</b>	<b>sentence</b>	163:23
89:3,7	181:18	274:24	183:10
<b>sector</b>	<b>Senate</b> 10:10	<b>separate</b>	199:23
185:7,11	17:8	18:3	253:18
<b>secure</b> 80:25	<b>senator</b>	<b>separately</b>	261:11
81:2,5,12	10:11,17	69:18	<b>served</b>
213:15	137:24	159:24	13:1
<b>security</b>	<b>send</b> 45:2	<b>series</b> 214:9	<b>services</b>
34:14,20	62:22	249:18	30:3,12
35:1 45:25	63:2,3,4	<b>serve</b> 54:7	32:5,6,13
58:6 82:8	86:2	<b>served</b>	34:1,23
91:21 99:9	101:18	103:11,13,	37:3 40:6
123:1	161:3	15 150:19	73:7
128:25	249:25	<b>server</b> 81:20	106:10
129:4	<b>sender</b> 289:9	167:18,23,	108:11,12,
131:16	<b>Sending</b>	24 168:14,	13 110:12,
132:2	159:7	16 170:1,	14 111:15
159:22	<b>senior</b>	2,3,6,18,	112:7,8,10
167:22	130:18	19 171:1,	119:21
168:14	145:24	4,23	125:5
169:8	<b>sense</b> 65:12	195:14	162:24,25
173:2,24			227:15
			229:7,12
			263:16

## EASTERN PROFIT CORPORATION LIMITED vs STRATEGIC VISION US, LLC

J. Michael Waller on 02/08/2019

Index: serving..signed

285:8	220:7	230:12	129:4,10
<b>serving</b>	<b>shaking</b>	262:19	130:14
54:24	208:13	272:13,23	133:8
			140:11
<b>set</b> 28:21	<b>shape</b> 47:23	<b>showed</b> 46:24	
31:18 32:1		47:3	<b>Signal</b> 81:1,
39:18 49:3	<b>shapes</b>	154:13	5,11,21
54:6 60:9	262:5,8	168:18	95:4
82:19,23	<b>share</b> 45:9	171:23	116:8,11
98:24	75:3	172:2	128:12
114:2	<b>shared</b> 74:22	219:14	130:7,9
121:9	267:12,13	234:1	135:23
125:19		273:12	144:3
135:7,13	<b>Shawshank</b>	<b>showing</b>	150:15,21
156:3,20	179:4	125:17	151:12
175:25	<b>Shchekochikhin</b>	135:7	200:13,17
224:23	146:22	168:15	201:1,5
272:2	<b>she'll</b> 17:12	170:1	215:21
273:8		231:23	217:15
277:16	<b>Sherry-</b>	233:23	218:23
279:18	<b>netherlands</b>	267:11	219:1,2
	201:20,21	273:22	271:11
<b>sets</b> 83:9	<b>short</b> 74:8	276:18	282:9
<b>setting</b>	105:9	<b>shown</b> 31:13	<b>Signals</b>
55:21	196:15,18,	<b>shows</b> 104:23	262:10
127:16	22 270:16	155:20	<b>signed</b> 46:20
198:19	<b>short-term</b>	214:6,7	47:5,9,17,
260:19	56:8 71:19	<b>shut</b> 171:3	21 57:22
<b>settled</b>	<b>shortly</b>	<b>side</b> 89:15,	58:1 62:5
123:13	164:23,24	17 140:4	75:25 98:8
159:12	<b>shot</b> 172:7	246:1	109:6
<b>setup</b> 58:2	<b>show</b> 135:6	<b>sight</b> 121:8	113:24
197:19	168:17	<b>SIGINT</b>	157:21
<b>sever</b> 220:9	169:11,20	262:10	158:16
<b>severance</b>	170:3	<b>sign</b>	161:6
219:23	202:24	128:19,23	164:24,25
<b>severed</b>	214:18		176:4
			186:8

## EASTERN PROFIT CORPORATION LIMITED vs STRATEGIC VISION US, LLC

J. Michael Waller on 02/08/2019

Index: signer..speak

275:9	<b>single</b>	50:10	251:4	151:16
289:18		183:24		156:19
<b>signer</b>		247:9	<b>smirking</b>	172:17
129:18	<b>sit</b>	204:23	101:19	187:15
<b>significantly</b>	<b>sit-down</b>		<b>smooth</b>	89:22
257:2	23:2		<b>so-and-so@</b>	205:11
<b>signing</b>	<b>sitting</b>	19:8	<b>yahoo.com</b>	208:15
36:12				227:24
100:8,9			214:8	239:14
129:2			<b>soaked</b>	252:21
130:23			125:10	<b>sorts</b>
133:10			<b>social</b>	33:22
159:16			52:22	<b>sound</b>
197:20	<b>situated</b>		164:1	21:21
199:6			240:11	73:11
<b>similar</b>	<b>situation</b>		241:25	155:4
52:7,8	59:11		253:11	211:13
82:18	<b>size</b>	251:6	254:1,14	<b>Source</b>
84:21		256:12	267:13	261:18,21
136:3	<b>skill</b>	82:19,	269:16,24	262:9
<b>simple</b>	23	83:8	276:17	<b>sources</b>
<b>simply</b>	<b>skills</b>	73:23	<b>societies</b>	144:7
56:4	<b>skin</b>	125:9	245:20	181:21
61:19	<b>slave</b>	53:20	<b>sole</b>	217:8
64:5,20	<b>slow</b>	110:5	283:19	<b>South</b>
67:18		224:11	<b>solid</b>	9:2
88:15	<b>small</b>	34:11	<b>solutions</b>	<b>Soviet</b>
122:7		96:17	71:3	110:3
148:2		200:5	<b>someone's</b>	<b>speak</b>
178:20		219:22	187:23	54:8
196:8		233:4	<b>sophisticated</b>	55:4
198:3		243:13	278:17	73:9
199:10		251:6	<b>sort</b>	75:25
200:17	<b>smaller</b>	39:8	32:22	78:25
248:4			50:24	85:7,9,23
			51:19	102:23
				128:11
				130:6
				160:10
				170:2
				187:11
				247:1



## EASTERN PROFIT CORPORATION LIMITED vs STRATEGIC VISION US, LLC

J. Michael Waller on 02/08/2019

Index: speaking..started

284:25	124:4	<b>spy</b> 101:15	82:5,9
<b>speaking</b>	<b>speed</b> 205:15	<b>Square</b> 53:22	136:20
27:2,21	<b>spelled</b> 60:1	<b>stack</b> 282:17	<b>standby</b>
43:18	69:4	<b>staff</b> 29:1	177:4
75:16	126:15	114:15	<b>stared</b>
103:25	136:3	<b>staffer</b>	205:12
164:15	248:11	10:10,12,	<b>Starovoitova</b>
187:12	271:7	16	146:18
198:1	<b>spelling</b>	<b>stage</b> 60:21	<b>start</b> 10:23
<b>speaks</b> 54:9	108:1	<b>stages</b>	26:19
160:1	<b>spent</b> 43:25	128:16	33:15 36:9
<b>spec</b> 220:16	53:19	<b>stamped</b>	42:1,9
<b>special</b>	203:21	105:14	67:14
11:19 77:9	<b>spirit</b> 283:2	113:6	93:15 95:4
114:25	<b>split</b> 16:15	226:3	166:17
<b>specialists</b>	23:2	229:24	186:13
256:14	38:18,21	230:3	187:9,19
<b>specific</b>	39:25	233:11	206:19,25
27:22	43:23 44:4	255:7	207:12
35:20	45:13,19	259:4	267:9
37:25	<b>splitting</b>	263:21	271:16
56:17 57:2	42:5,20,23	267:5	273:14
186:15	43:3,9,13	270:22	277:2,6
187:14	45:17	<b>stand</b> 98:9	<b>start-up</b>
188:24	<b>spoke</b> 26:25	222:18	36:2 42:6
248:11	124:13	<b>standard</b>	126:22
<b>specifically</b>	130:3	19:1	255:24
23:11	159:23	66:16,20	256:1,4
36:22 37:9	163:3,9	82:8 94:11	274:16
38:1 68:17	<b>spoken</b> 54:13	122:20	<b>started</b> 8:10
142:6	<b>spokesman</b>	195:9,15	11:16 12:3
<b>speculate</b>	227:11	262:3	56:22
175:9	<b>spoofed</b>	<b>standards</b>	60:21
<b>speech</b>	89:15	81:25	187:22
118:25			216:8
			273:9

## EASTERN PROFIT CORPORATION LIMITED vs STRATEGIC VISION US, LLC

J. Michael Waller on 02/08/2019

Index: starting..Strategic

<b>starting</b>	28:23,24	123:25	56:6 68:23
28:24 29:2	34:24	124:3,5,	99:2
34:6 36:5,	124:8	10,13	158:21
11 42:3,10	136:25	<b>stick</b> 57:10	<b>strange</b>
84:24	137:9	171:25	49:20,22
93:14	138:15	<b>sticking</b>	50:1
109:20,24	168:3	277:21	<b>Strategic</b>
126:2	174:24	<b>sticks</b> 56:24	7:5,18
187:20	175:1,15	<b>stipulated</b>	10:25
188:2	177:5	62:1	11:16
209:8	182:24	<b>stock</b> 19:9	12:2,5,20
272:2,9	183:4	<b>stolen</b>	13:2,7,14,
273:2	211:7	238:20	23 14:4
<b>state</b> 7:24	239:3	<b>stomped</b>	15:14,24
35:1 89:11	240:12	205:10	16:5 19:1,
109:3	260:11	<b>stop</b> 97:14,	9,13
132:2	263:12	19 103:22	26:18,23
181:3	269:15	133:18	27:1,6,9,
<b>state-of-the-</b>	<b>Station</b>	143:8	16,18
<b>art</b> 82:12	203:1	152:13	28:5,17
<b>state-owned</b>	211:11	219:6	29:20
167:19	212:2	222:13	31:4,5
<b>stated</b>	<b>stature</b>	253:1	32:4,13
100:18	250:15	<b>stopped</b>	35:2,8
230:23	<b>status</b> 56:13	103:20	36:6 37:3,
<b>statement</b>	57:7,10	133:12	13 38:4,
13:20	58:3 59:5,	174:16	16,25
98:11	10,11,19	<b>stopping</b>	40:10,16
175:5	60:8 67:6	72:3	41:7 43:2,
186:20	198:3,19	<b>storefront</b>	9,19,23
<b>statements</b>	200:19	16:1	44:1,17
39:22,24	201:4	<b>story</b> 243:7	45:2,12,15
41:4	<b>stay</b> 240:1	<b>straight</b>	51:7,10,16
<b>States</b>	<b>stayed</b>		52:7,12,15
16:13,14,	203:21		53:4 55:2,
21 23:7	<b>Steve</b> 119:6		4 72:21
			74:15

## EASTERN PROFIT CORPORATION LIMITED vs STRATEGIC VISION US, LLC

J. Michael Waller on 02/08/2019

Index: street..summary

75:3,8,12,	263:2	250:8	<b>substance</b>
13,16,23	264:15	269:17	14:8
76:2,7	274:9	276:17	163:15
78:20,23,	276:14	<b>subcontracted</b>	<b>substantial</b>
25 82:7	282:21	76:9	273:7
90:5,19	283:5,11,	<b>subject</b>	<b>succeed</b>
92:2,10	17,19	48:10	156:10
93:20	284:6,17,	50:14,19	<b>successively</b>
95:11	19,21,22,	180:16	194:19
99:3,18	25 285:4,	250:20	<b>Suen</b> 70:8
101:2	5,8 286:7	263:12,20	164:7
106:8,17,	287:16	<b>subjects</b>	169:21
24 107:7,	288:25	16:19 48:1	235:9
10 108:10,	289:8	145:11	<b>Suen's</b>
16 109:1	<b>street</b> 121:7	254:4	167:17
112:8	<b>streets</b>	265:24	173:2
117:15,24	245:9	<b>submit</b> 67:12	174:8
118:5	<b>strict</b> 203:8	101:12	<b>sufficient</b>
129:3,6	<b>strike</b> 26:19	<b>submitted</b>	122:23
145:17	96:20	282:21	<b>suggest</b>
157:10	161:9	283:4	126:23
158:22	229:10	<b>subsequent</b>	<b>suggested</b>
166:1,6	286:7	26:2 35:20	92:21
171:11	<b>string</b> 151:7	47:1	117:8
173:15	<b>structure</b>	100:18	<b>suit</b> 228:24
174:7	96:16,18	171:24	234:22
183:3	97:11	206:14	277:20
187:8,11	<b>struggle</b>	232:5	<b>suite</b> 227:15
188:19	54:17,19	256:17,19	<b>suits</b> 247:2
189:7,11	<b>student</b>	<b>subsequently</b>	<b>sum</b> 36:7,8
196:25	53:22	23:12	39:8 257:1
220:2	155:10,24	165:21	<b>summary</b>
227:24	<b>stuff</b> 71:8	173:15	71:7,9
228:2	125:20	233:25	
229:6,11,	139:9	270:6	
20 249:19			
260:11			
261:10			

## EASTERN PROFIT CORPORATION LIMITED vs STRATEGIC VISION US, LLC

J. Michael Waller on 02/08/2019

Index: super..talk

<b>super</b> 118:1	<b>suspected</b>	<b>SVUS268</b>	<b>system</b>
239:14	178:19, 24	268:1	181:24
<b>supervise</b>	180:9	<b>SVUS278</b>	184:9
29:16	219:24	263:21	185:21
<b>supervising</b>	221:20	<b>SVUS62</b>	195:11
62:14	222:4	118:11	234:16
82:21 84:1	<b>suspicion</b>	<b>SVUS80</b>	<b>T</b>
<b>supplemental</b>	188:21	229:24	<b>tactics</b>
282:20	<b>SV</b> 283:11	<b>swarming</b>	248:25
283:3	<b>SV267</b> 267:7	249:4	249:5
<b>support</b>	<b>SV269</b> 261:21	<b>swearing</b>	<b>tail</b> 219:13
11:18	<b>SV385</b>	7:12	<b>tailored</b>
221:18	233:11, 16	<b>switching</b>	66:18
240:12	<b>SV402</b>	113:9	125:10
<b>supporters</b>	233:11, 16	<b>sworn</b> 7:23	<b>takeaway</b>
241:18	<b>SV68</b> 132:21	<b>sympiosis</b>	232:12
254:10	<b>SV69</b> 132:17	239:14	<b>takeaways</b>
<b>suppose</b> 24:2	<b>SV70</b> 139:11	<b>symbols</b>	230:10
<b>supposed</b>	<b>SV72</b> 144:4	262:5	<b>takes</b> 56:16
25:15	<b>SV80</b> 230:3	<b>sympathy</b>	72:7 82:19
102:8	<b>SVUS000077</b>	244:5	89:17
140:3	226:3	<b>synergies</b>	174:3
272:20	<b>SVUS00262</b>	245:21	195:10, 23
<b>supposedly</b>	259:4	<b>synergy</b>	275:23
34:11	<b>SVUS260</b>	141:7	276:3
<b>surprise</b>	255:7	<b>synthesis</b>	<b>taking</b> 38:4,
160:23	<b>SVUS263</b>	72:22	5 44:22
<b>surprised</b>	259:16	253:11	138:5
215:23	<b>SVUS265</b>	<b>synthesized</b>	<b>talent</b> 15:13
<b>surrogate</b>	260:2	57:12	<b>talk</b> 12:14
129:1, 4	<b>SVUS267</b>	<b>synthesizing</b>	16:6 26:9
<b>suspect</b>	267:5, 18	72:15, 17,	49:21
137:18		18	52:24 55:8

## EASTERN PROFIT CORPORATION LIMITED vs STRATEGIC VISION US, LLC

J. Michael Waller on 02/08/2019

Index: talked..team

57:23 79:3	104:1	213:23	13,16,19,
88:18	123:24	254:4	23 78:4,5,
90:23	124:22,24	268:11	9,18,21
106:15,22	127:18	276:19	79:4,9
125:14,23	128:21	<b>targeted</b>	80:1,2,4,
129:8	133:19	164:18	17,18
134:1,2,11	134:21		82:15
142:10	139:17	<b>targets</b>	83:14,24
143:7	145:20	64:23	84:9 85:18
150:20	146:2	69:13	86:8,15,17
152:3	147:10	71:11	93:17 94:7
153:18	152:11	202:11	95:1,2,8
166:22	153:6,11,	222:3,9	96:2
167:9	16 154:5	235:1,5,19	122:22
185:18	156:7	269:23	131:20,23
201:10	161:21	278:20	146:16,18
217:13	203:11	<b>task</b> 56:23	151:9,12
277:12	204:9	58:5	155:21
<b>talked</b> 11:3,	215:7	<b>tax</b> 269:16	156:6
24 26:2	216:18	<b>team</b> 27:22	166:16,19,
68:16	223:21	29:15,16,	22 167:2
78:24	224:15	17 42:2,	168:8,9,12
100:13	225:5	15,16	174:10,14,
117:7	252:17	52:21	15,19,25
119:2	258:4	55:21	175:4,12
126:2	259:18	56:6,21,22	176:14,17,
162:8	273:16	58:4	19 177:3
204:24	276:10,12,	61:20,25	178:7,14,
231:19	17 277:8	62:14	15,24
258:6	278:22	67:17,23,	179:9,19,
277:4	<b>talks</b> 130:9	24 68:20	21,22
<b>talking</b> 8:14	<b>tank</b> 48:19,	69:17,25	180:23
11:16 12:3	21 49:12	72:1,7,17	185:25
23:24	50:18 97:4	75:14,19,	186:3,8
27:13 53:4	<b>target</b> 50:20	20 76:5,	191:8
64:25 96:5	71:25	12,25	192:7,9,
100:12	170:13	77:1,8,11,	13,20
			193:10,18,

## EASTERN PROFIT CORPORATION LIMITED vs STRATEGIC VISION US, LLC

J. Michael Waller on 02/08/2019

Index: teamed..test

25 194:5,	279:12,14,	57:15	35:3,14,17
16,22,25	21,24	100:6	36:20
195:6	284:22	173:21	37:12,15,
198:19	287:21,22,	224:5	16 38:3,4
208:23	23 288:2,	237:1	45:16,18
210:22	22	<b>tells</b> 170:12	50:1,22
211:3,20	<b>teamed</b> 38:8	<b>ten</b> 33:15	51:11,15
213:18,24	<b>teams</b> 12:18	34:7 49:2	52:9 56:8
218:2,4	15:6 27:23	50:6 94:18	66:16
219:5,7	28:21	95:20	67:13
220:4,12,	36:3,10	175:13	68:8,19
13,18,20,	45:23 55:7	235:1,5	69:21
23,24	72:19	256:20	70:18
221:2,4,9,	83:23	<b>tens</b> 224:18	72:20
22 222:10,	84:18	225:6	88:9,13
13,19	174:13,18	<b>tentatively</b>	112:7
224:5,8,	222:2,7,	32:2	120:18
10,17	10,12	<b>term</b> 43:14	142:2,21
245:13	223:7	48:5,6,7	144:17
247:17	247:10	49:14	149:16
255:12,14,	260:16	50:15	150:2
17 256:11	275:17	180:24	151:21
257:1,17	<b>tear</b> 189:4	280:20	162:23
258:9,11,	<b>technical</b>	<b>terminated</b>	170:21
23 260:5,	204:15	97:16	187:16
6,18,19,	288:16	<b>terminating</b>	192:24
23,25	<b>techniques</b>	45:7	248:7
261:24	224:9	<b>termination</b>	256:12
262:1	<b>technology</b>	103:8	280:23
263:3,5	204:15	<b>terminology</b>	288:5
267:11	<b>telephone</b>	51:4	<b>Teske</b> 7:19
268:4,13	160:15,16	<b>terms</b> 26:23	18:8
272:5	<b>telephonically</b>	29:6	196:18
275:13,25	47:19,20	32:15,18	281:2,16,
276:18,25	<b>telling</b>		18 282:13
277:3,5,6,			<b>test</b> 167:5,
8,13			9,10 168:4
278:23			

## EASTERN PROFIT CORPORATION LIMITED vs STRATEGIC VISION US, LLC

J. Michael Waller on 02/08/2019

Index: testifies..time

235:7,13	180:11	<b>thinker</b>	<b>thread</b>
<b>testifies</b>	184:11	121:12	116:9,11
7:24	216:17	<b>thinking</b>	123:21
<b>testimony</b>	231:9	153:21	124:3
8:13	244:7	251:11	155:1
206:24	258:22	<b>thinks</b>	<b>threat</b> 124:7
<b>tests</b> 138:17	284:10	196:12	<b>threats</b>
<b>Texas</b> 77:8,	<b>things</b> 23:6,	269:4	240:16
11 179:23	18 25:11	<b>third-party</b>	<b>three-year</b>
180:10	30:7 33:12	281:19	34:8,9
<b>text</b> 47:12,	38:1 44:2	<b>thought</b>	230:12
13 80:25	56:14	24:21	<b>threw</b> 23:14
81:2 95:4	59:10 60:4	26:13	<b>throw</b> 150:3,
116:8	63:21 71:2	49:22	5 173:23
118:12	74:1 84:8	50:23	<b>throwing</b>
120:18	94:2,16	94:14	262:22
123:16	97:4,20	132:11	<b>thumb</b> 56:5
137:21	110:22	135:3	192:10
215:21	121:1,19	137:16	216:11
<b>text-like</b>	124:6	158:15	<b>Tiananmen</b>
282:10	125:2,22	167:2	53:22
<b>texts</b> 274:6	126:17	178:1	<b>tie</b> 125:3
<b>thanked</b>	135:18,20	196:7	<b>tied</b> 110:4,
162:14	146:6	204:12	6 240:17
<b>thereabouts</b>	148:4	207:7	<b>tight</b> 76:13
211:15	152:7	208:11	<b>time</b> 7:6
<b>thing</b> 59:1	153:18	221:15	8:16 12:7
91:23	163:5	228:23	24:14
101:20	164:2	263:5	25:14,23
133:3	171:17	268:23	26:10
139:8	177:17	269:13,19	30:25 33:7
155:1,17	232:15	270:9	35:21
163:14	241:24	<b>thousand</b>	37:18
170:12	242:17	259:20	42:19,22
	243:16	<b>thousands</b>	
	255:25	224:18	
	263:9		



## EASTERN PROFIT CORPORATION LIMITED vs STRATEGIC VISION US, LLC

J. Michael Waller on 02/08/2019

Index: time-consuming..top

43:1,21	220:19	227:8,14	135:22
48:25	222:9	<b>today</b> 8:19	149:2,6
89:12	223:11	18:21 19:8	153:3,12
91:17	228:22	24:2	160:21
93:13	232:7	77:12,25	161:10
95:10	233:9	118:25	171:17
102:18	234:2	149:21	174:5
103:2	262:20	152:6	180:22
111:19,21	271:23	153:24	182:16
121:10,15	275:23	237:1	183:13,15
123:4,5,25	276:3,24	244:15	184:16
128:4	280:8,9,	281:18,23	188:15
129:23	18,24	282:3,7	190:22
132:20	281:12	289:16,21	191:15
137:17	289:21		194:14
140:14	290:2	<b>today's</b> 7:5	195:12
141:12		290:2	205:2,15
144:18	<b>time-consuming</b>	<b>token</b> 232:19	211:19,22
155:4	56:23		216:4
157:10	60:17	<b>Tokyo</b> 119:8,	218:21
158:8	<b>timeframe</b>	11,14	220:15
163:2,14	196:16	123:21	221:9
174:1	<b>timeline</b>	<b>told</b> 23:4,6	222:17
183:12	230:12	24:16	235:5
191:22,23,	<b>times</b> 50:6,	25:17,20,	274:20
24 192:1	14 60:15	21,22	287:23
195:2,10	64:4 84:11	26:21	288:22
197:4,11	104:9	56:16,17	
199:12	175:3,11,	58:15,16	<b>top</b> 70:4
200:2	13 192:1	71:9 72:18	75:23
201:12	194:21	104:8	95:17
203:4,16	197:5,6	107:1	153:8
205:19	274:2	110:12	178:5
207:17	278:9	112:12	190:12
213:16		130:16	226:7
215:14	<b>tipped</b>	131:17	244:12
216:13	183:22	132:3,22	245:4
217:9	<b>titled</b>	133:18	265:17
			266:7

## EASTERN PROFIT CORPORATION LIMITED vs STRATEGIC VISION US, LLC

J. Michael Waller on 02/08/2019

Index: top-quality..trust

<b>top-quality</b>	211:12	<b>translated</b>	<b>traveling</b>
122:19	<b>Trade</b> 167:21	274:3	58:10
<b>topple</b>	<b>traders</b>	<b>translation</b>	72:3,4
227:25	246:4,14	84:23 85:1	211:22
<b>toppled</b>	<b>trading</b>	86:14	<b>Treasury</b>
156:5	246:17,21	186:22	31:24
<b>toppling</b>	<b>tradition</b>	<b>translations</b>	121:7
137:14	209:13	85:20	231:18
<b>total</b> 14:3	<b>trail</b> 37:20	<b>translator</b>	<b>treated</b>
50:12	101:11,12	148:3	74:21
95:19	225:1	<b>translators</b>	<b>tree</b> 10:6
236:12	<b>train</b> 199:18	85:14	41:20,21
<b>totalitarian</b>	226:22	<b>transliteration</b>	268:2
227:10	<b>tranche</b>	<b>n</b> 178:19	<b>trees</b> 236:11
228:1	208:22	<b>transliteration</b>	<b>trial</b> 84:14
<b>totally</b> 92:2	210:3	<b>ns</b> 178:17	<b>trip</b> 72:9
<b>touch</b> 116:21	261:4	<b>transmitted</b>	<b>trolling</b>
163:16	<b>transactions</b>	88:16	249:2
276:24	41:3	<b>transmitting</b>	<b>trouble</b>
<b>tout</b> 111:5	<b>transcript</b>	87:22	71:20
112:2,5	40:22	88:13	<b>true</b> 224:5
<b>Tower</b> 125:20	175:6	<b>trap</b> 287:16	<b>Trump</b> 112:15
135:12	<b>transfer</b>	288:7,11,	118:24
<b>traceable</b>	100:25	12	241:13,14,
199:20	<b>transferred</b>	<b>travel</b> 45:23	18,20,23
<b>track</b> 71:11	41:6,24	199:8,13,	242:5
<b>tracking</b>	<b>transfers</b>	15,19	248:19
33:20	99:6	210:24	<b>trust</b> 12:23
52:18,20	<b>transform</b>	219:12	63:19,21
66:21	245:18	223:12	83:10
96:14	<b>translate</b>	224:1	84:13,16
140:5	85:4	<b>traveled</b>	124:19
<b>Tracks</b> 65:2		17:12	130:17
		53:25	132:8

## EASTERN PROFIT CORPORATION LIMITED vs STRATEGIC VISION US, LLC

J. Michael Waller on 02/08/2019

Index: trusted..understand

133:3,14,	267:25		55:15 57:1
18 138:17,	272:24	<b>U</b>	58:14 60:5
20,22	274:19		79:2 87:2
141:16		<b>U.S.</b> 10:11	89:21
147:18,20	<b>tweet</b> 250:20	11:19,20,	90:14
191:14,19	<b>Tweets</b>	22 31:24	93:18 98:7
192:5	241:14	73:1,7	99:15
206:12	<b>Twitter</b>	76:8 121:7	117:1
278:20	243:12,16	171:20	120:10
<b>trusted</b>	250:10,14	175:22,24	126:5,14
132:7	<b>type</b> 12:18	180:16,19	129:2
133:7	27:24	181:2	130:12
139:4	33:25	182:6	134:20,24
140:14	52:16 56:2	241:11	142:20,23
162:21	59:12	243:23	145:10,18
191:20	66:11	263:16	148:18
<b>trusting</b>	71:22	<b>U.s.-based</b>	170:16,25
80:1	91:17	248:17	176:19
133:6,12	139:4	249:6	192:14
139:1	143:4	<b>Ukraine</b>	202:11
192:2	146:8	109:25	205:25
<b>Turkey</b> 111:9	148:7	<b>ultimately</b>	208:24
<b>turn</b> 74:18	183:7	92:25	210:1
118:11	185:8	125:5	216:16
253:9	250:17	145:10	237:2,11
263:23	264:19		238:6
	275:20	<b>Um-hum</b> 126:4	240:4
<b>turned</b>	<b>types</b> 33:16	251:2	241:21
195:25	34:7	277:25	249:16
<b>turning</b>	142:15	<b>unarmed</b>	252:3
118:23	146:12	156:12	253:9,21
120:6	256:13	<b>uncorrupted</b>	262:4
124:18	<b>typically</b>	165:15	268:11
139:11	247:4	<b>understand</b>	269:10,22
148:14	250:19	31:1 41:1	273:17
215:17		42:12	274:2
234:15		43:20	276:13,19
			278:12

## EASTERN PROFIT CORPORATION LIMITED vs STRATEGIC VISION US, LLC

J. Michael Waller on 02/08/2019

Index: understandably..vehicles

280:5	256:11	<b>University</b>	<b>USB</b> 56:5
287:20	273:19,20	9:7,8,9	58:7 59:13
288:14	274:7,18,	<b>unnecessary</b>	61:21 64:6
<b>understandably</b>	20	149:23	65:9,18
139:20	<b>underway</b>	<b>unprofessional</b>	87:17,22
<b>understanding</b>	55:19	173:21	88:4 89:20
38:25	<b>unethical</b>	<b>unreasonable</b>	165:4,6,13
54:17 67:4	136:7	152:7,17	176:3,16,
91:14	<b>unit</b> 24:12	153:1	23 192:10
98:10	148:13	154:2	193:19
145:15	<b>unite</b> 110:15	<b>unrelated</b>	194:24
185:2,15	<b>United</b>	135:19	195:3
189:2,6	16:13,14,	161:5	197:4
263:13	21 23:7	<b>unreliable</b>	200:10
273:1,5	28:23,24	130:20	202:4,6,24
274:13	34:24	<b>untraceable</b>	203:12
283:16	124:8	101:11	208:23
284:7	136:25	<b>unusually</b>	216:22
<b>understands</b>	137:9	84:12	218:3
85:10	138:15	<b>update</b>	<b>USBS</b> 218:12
<b>understood</b>	168:3	192:8,21	<b>USSR</b> 110:2
50:5 51:5	174:24	<b>updates</b>	<hr/>
54:23	175:1,15	192:6	<b>v</b>
57:16	177:5	<b>upend</b> 140:7	<b>vague</b> 151:14
60:19 76:7	182:24	<b>upset</b> 94:1	<b>valuable</b>
93:15	183:4	103:6	269:17
97:18	211:7	158:20	<b>variety</b> 11:9
98:15 99:7	239:3	171:19,21	<b>vary</b> 97:9
127:7	240:12	204:12	<b>Varying</b>
134:5	260:11	206:17	217:10
141:17	263:12	207:18	<b>vehicle</b>
142:17	269:15	258:12	114:4
147:25	<b>universe</b>	269:2	256:5
161:14	53:25		<b>vehicles</b>
177:16	71:23		
179:6	97:22		
237:13,19			

## EASTERN PROFIT CORPORATION LIMITED vs STRATEGIC VISION US, LLC

J. Michael Waller on 02/08/2019

Index: venture..vision

156:13,16	<b>version</b>	11:17	106:8,17,
<b>venture</b>	154:9	12:2,5,20	24 107:10
247:22	166:14	13:2,7,15,	108:10,17
	191:3	24 14:4	109:1
<b>verbal</b> 32:8	271:3	15:15,24	117:15,24
40:3 57:9,	<b>versions</b>	16:5 19:1,	118:5
10 70:14,	18:24	9,14	129:3,6
16 101:4,6	165:15	26:19,23	145:17
102:2,24		27:1,6,10,	156:25
103:1,9	<b>versus</b> 7:4	16,18	157:10
139:18	60:3 61:17	28:5,17	166:2,6
197:18	99:11	29:21 30:7	171:11
198:4	141:9	31:4,5	173:15
200:8,9,	154:4	32:4,13	174:7
13,14,20	<b>vetted</b>	35:2,8	183:3
216:12	184:21	36:6 37:13	187:9,11
218:14	<b>vetting</b>	38:4,16	188:20
<b>verbally</b>	86:24	39:1 40:10	189:8,11
59:11	<b>vice</b> 115:19	41:7 43:2,	196:25
102:22	139:4	9,19,23	220:2
143:21		44:1,18	227:8,22,
197:5	<b>view</b> 51:7	45:2,12,15	24 228:2
200:16	121:8	51:7,10,16	229:6,11,
208:10	275:6	52:7,12,15	20 245:18
218:24,25	<b>viewed</b>	53:4 55:3,	249:19
219:15	258:21	4 72:21	253:1,5
<b>verification</b>	<b>violation</b>	74:15	260:11
176:8	163:6	75:3,8,12,	261:10
<b>verify</b>	<b>violence</b>	13,16,23	263:2
177:13	78:8	76:2,7	264:15
224:4	<b>virgin</b> 212:4	78:20,23	274:9
277:3	<b>Virginia</b>	79:1 82:7	276:14
<b>verifying</b>	176:18	90:5,19	282:22
224:8,9,16	192:19	92:2,10	283:5,11,
277:13	<b>vision</b> 7:5,	93:20	17,20
<b>versa</b> 139:4	18 10:25	95:11	284:6,17,
		99:3,18	19,22,25
		101:2	285:4,6

## EASTERN PROFIT CORPORATION LIMITED vs STRATEGIC VISION US, LLC

J. Michael Waller on 02/08/2019

Index: Vision's..Wang

286:7	33:25	16:23	167:13
287:16	46:11,14	17:1,15	193:13
289:1	47:5,6	20:12,13	208:4
<b>Vision's</b>	58:13	21:20	215:8,15
37:3 40:16	61:11	25:21	218:7
107:7	62:17	26:1,11,22	228:14
112:8	63:22	27:20	254:23
158:22	73:15	28:18	258:2
285:8	74:11,17	29:4,20	264:13
289:8	79:12	30:15,23	265:1
	105:12,13,	31:6,12	266:19
<b>visualize</b>	16 113:4,5	38:5,18	283:12
268:9	116:8,10	40:5 43:19	284:25
<b>visually</b>	157:9	44:12	286:6,8
219:14	164:6	46:21	287:10
<b>volume</b> 250:6	186:19	49:17,25	289:7
	212:17	51:3,12	
<b>volunteer</b>	214:25	63:15	<b>Wallop's</b>
104:10	215:3	72:24	10:12
	226:2	73:17	15:25 29:5
<b>W</b>	229:23	74:15	30:8
	230:8	76:11 79:3	102:10
<b>waffling</b>	233:8,17	85:9	105:23
120:25	255:6	100:12,13	137:4
121:3	259:3	102:21	189:21
<b>waging</b>	261:17	111:2,9,24	190:16
227:25	263:20	112:18	<b>Walmart</b>
	267:4	114:3,18	249:14
<b>wait</b> 8:11	270:21,25	116:23,24	<b>Wang</b> 20:13
132:23	281:17	129:8	31:3,13
<b>waiting</b>	282:20,25	137:12	46:21
177:4	283:24	145:17	51:20
<b>wall</b> 170:6	289:21	152:23	57:16
	290:2	158:8	58:17 62:8
<b>waller</b> 7:3,		159:13	65:2,19
22 8:3,21,	<b>Wallop</b> 10:8,	160:9	81:17
22 17:22	20,24	161:11	106:16,23
18:6,9,10,	11:15	165:5,7,20	107:13
11,17	12:2,10		

## EASTERN PROFIT CORPORATION LIMITED vs STRATEGIC VISION US, LLC

J. Michael Waller on 02/08/2019

Index: wanted..wide-ranging

108:20	123:4,7	<b>warned</b>	<b>week</b> 72:3,8
112:22	125:2,22	220:16	103:10,13
130:5	136:6	<b>wary</b> 146:12	152:1
131:13	141:2,5,6		166:9
140:16	143:20	<b>Washington</b>	180:1
151:5	145:7	9:3,7,14	186:4
165:11	148:20	30:14	198:24,25
167:11	162:15,20	31:14,20,	199:5
215:9	167:6,17,	22 32:10	200:4
271:12	23 170:11	114:9	
272:8	171:9,17	121:6	<b>week's</b>
274:3	189:3,4	160:19	219:19
280:5	204:14	176:17	<b>weekly</b> 55:18
<b>wanted</b> 23:4	205:22	231:18,20	58:17 66:1
24:17,18,	206:3,4	232:8,9	67:2,5,11,
22,24,25	220:21,25	<b>watch</b> 254:13	14,21
25:5	221:21		72:11
26:18,21	224:4	<b>watches</b>	96:19 97:1
30:8	228:20,23	243:14	127:15
31:18,21	231:11	<b>watching</b>	<b>weeks</b> 60:17
32:1	235:6,22	144:22	94:16
33:12,13,	238:5,8,9,	<b>water</b> 49:11	102:11
15,16 34:8	10,11	97:4	195:25
35:15	240:8,19		207:2,5,
37:13,17	242:19	<b>waterline</b>	14,23
43:15 52:3	250:1	49:14,15	221:7
59:3,4	261:8	50:18 97:7	237:5
61:8,9	263:6,7,17	<b>ways</b> 11:9	
68:23	275:20	101:25	<b>weird</b> 48:7
69:14 70:4	<b>wanting</b>	170:10,14,	<b>Wengui</b> 24:4
77:20	122:1,4	15 199:19	<b>Westchester</b>
92:19	<b>War</b> 11:5,6,	224:25	30:15
94:25 97:5	17 138:11	248:11	<b>White</b> 31:25
102:13		<b>weapon</b> 238:1	112:3,9,11
117:3	<b>wardrobe</b>		121:9
120:25	135:6	<b>websites</b>	
121:4	<b>warfare</b>	222:1	<b>wide-ranging</b>
122:7	249:2	<b>wedlock</b> 25:8	110:20



## EASTERN PROFIT CORPORATION LIMITED vs STRATEGIC VISION US, LLC

J. Michael Waller on 02/08/2019

Index: William..worked

<b>William</b>	127:23	84:17, 20	185:5, 19
162:2	179:3	85:6 86:14	188:3, 17
<b>win</b> 248:18	191:25	90:12	190:25
	207:25	91:14, 16,	191:14, 16
<b>win-win</b>	208:1	17 92:11	192:5
137:10	245:24	93:7, 8, 10	197:19
<b>Windows</b>	251:14	94:6 95:6,	202:9, 10
172:8	266:23	10 97:14	206:11, 12
<b>wine</b> 233:4	<b>work</b> 9:11,	98:7, 11	209:23, 24
	12, 19	101:21, 25	219:7, 24
<b>wire</b> 100:24	10:1, 15	102:12	220:15
157:10, 24	11:6, 7, 14	103:7, 20,	222:9
160:2	12:16, 22	22, 23	223:10
161:11	13:17, 21	104:18	225:14
289:17	14:4, 8, 11,	107:2, 9, 14	226:17
<b>wires</b> 157:13	16, 21, 23	109:18	242:24, 25
158:4, 7	15:1, 4	110:8, 21	245:22
160:3	16:4, 24	112:16, 24	246:13
289:9, 10	17:3, 14	113:1, 2	249:24
<b>wondered</b>	21:11, 16	114:4, 7	250:13, 17
162:20	26:12	115:22	253:15
	27:9, 17	116:1	254:20, 21
<b>word</b> 18:14	28:2, 22	117:22	257:24
66:20	30:2 36:8	121:15, 17	258:17, 24
98:11	42:23	123:25	260:10, 22
104:15	43:5, 17	124:2	264:15
139:6	44:6, 21, 23	126:22	268:14
280:16	52:17	131:12	272:13, 23
<b>wording</b>	54:2, 25	141:10	275:20
66:12 98:5	65:14	142:15, 23	277:13
<b>words</b> 17:15	67:15, 17	146:8	<b>worked</b> 11:4
26:14 35:6	68:3, 8, 11	147:24	20:14
49:11	69:16	148:15, 21	27:15
67:15	71:12	149:2	38:10 52:6
69:21	72:23	151:2, 3	84:21
77:10	73:16 76:9	155:14	109:1
122:21	83:10, 12,	166:17	112:14, 23
	16, 20	176:8, 9	115:12

## EASTERN PROFIT CORPORATION LIMITED vs STRATEGIC VISION US, LLC

J. Michael Waller on 02/08/2019

Index: working..York

116:19	<b>works</b>	74:14	129:24	230:12
138:2		101:9	143:21	272:12
182:7		104:3	149:11,13,	
185:1,3		184:6	17 152:8	<b>x</b>
226:19		274:21	274:12	
260:3	<b>world</b>	9:16	<b>written</b>	<b>xi</b> 24:24
274:25		101:16	12:21	25:4
<b>working</b>		155:25	32:12	
9:12,25		262:16,25	40:1,4	<b>y</b>
10:23			70:19	
11:16,24	<b>worldwide</b>		101:5	<b>y-o-h</b> 138:7
12:10		17:11	126:18	<b>Yao</b> 212:18
13:4,5,10		188:18	175:6	<b>year</b> 36:17
16:5 17:1	<b>worries</b>		200:22,25	48:19
28:6 35:21		216:20	<b>wrong</b> 42:12	96:13
44:23	<b>worry</b>		43:13 69:4	247:10
46:21 54:3		216:15,17	73:20	<b>years</b> 10:9
56:15 71:2		286:23	177:23	53:19,24
82:13	<b>worse</b>	63:3	178:1,8,10	83:15
103:17		64:6	269:9	84:15
109:24		146:22	<b>wrote</b> 19:15,	116:19
115:23	<b>worst</b>	78:8	16,24	117:7
117:2			32:18	138:3
132:5,6	<b>worth</b>	139:14	120:21	155:12
150:16		140:7,8	122:14	162:19
155:15,16,	<b>write</b>	19:22	123:16	188:17
17 163:18		102:11	124:19	<b>Yeltsin</b>
185:1		177:16	126:21	110:6
216:1,15,		206:18	132:18,25	<b>Yoh</b> 138:7,
18,20,21		207:13	133:1	23 139:9
219:6		242:17	139:12	
220:18		249:11	140:22	<b>York</b> 7:24
221:16		266:11,13	144:5	21:24
222:14			148:15	30:14
223:21	<b>writing</b>		153:6	58:11 65:2
249:14		22:10	155:3	120:7,10,
268:7		78:13 94:3	207:17	21 144:8,
		102:1		

## EASTERN PROFIT CORPORATION LIMITED vs STRATEGIC VISION US, LLC

J. Michael Waller on 02/08/2019

Index: Younger..zeroing

12 147:3	147:8,17	<b>Yvette's</b>
153:22	150:15	217:11
155:20	151:5,9	
165:15	152:21,24	<b>z</b>
199:7	153:15,16,	
217:12	18,25	<b>Zach</b> 7:14
230:19	154:4,5,6,	8:4 282:14
231:21,22	23 159:24	286:20
<b>Younger</b>	160:4,9	<b>Zeichner</b>
243:3	161:8,10	7:15
	165:4,11,	
<b>Yui</b> 164:7	12 167:14	<b>zeroing</b>
<b>Yuri</b> 146:22	180:2	254:1
<b>Yvette</b> 20:13	183:13	
31:3,13	194:3,7,	
32:9 46:21	10,18	
51:20	195:19	
54:20,22	196:2	
57:3,16	197:23	
58:17	198:9,18	
59:8,17	201:13	
62:8,18	202:25	
63:8,17,19	203:3,5,14	
65:2,19	208:4	
81:17 94:3	211:10,22,	
95:2	25 215:22	
100:2,5,12	216:3	
102:18	217:11	
106:16,23	232:2	
107:13	260:20	
108:20	265:6	
129:18	267:19	
130:16,17,	271:12,16	
25 131:12	274:8	
133:15	275:5,9	
134:3,13	276:10	
141:18,20	277:12	
143:21,22		